Set Theory Relationship Mapping (STRM)

Reference Document : Secure Controls Framework (SCF) version 2024.1
Focal Document: AICPA 2017 Trust Services Criteria (TSC) with revised Points of Focus - 2022
STRM URL: https://content.securecontrolsframework.com/strm/scf-2024-1-tsc-2017.pdf

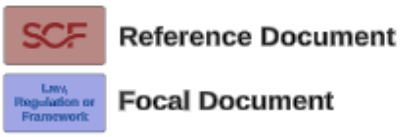
Set Theory Relationship Mapping (STRM) is well-suited for mapping between sets of elements that exist in two distinct concepts that are mostly the same as each other (e.g., cybersecurity & data privacy requirements). STRM also allows the strength of the mapping to be captured.

STRM relies on a justification for the relationship claim. There are three (3) options for the rationale, which is a high-level context within which the two concepts are related:

1. **Syntactic**: How similar is the wording that expresses the two concepts? This is a word-for-word analysis of the relationship, not an interpretation of the language.
2. **Semantic**: How similar are the meanings of the two concepts? This involves some interpretation of each concept's language.
3. **Functional**: How similar are the results of executing the two concepts? This involves understanding what will happen if the two concepts are implemented, performed, or otherwise executed.

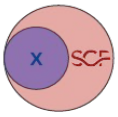
Based on NIST IR 8477, STRM supports five (5) five relationship types to describe the logical similarity between two distinct concepts:

1. **Subset Of**
2. **Intersects With**
3. **Equal**
4. **Superset Of**
5. **No Relationship**

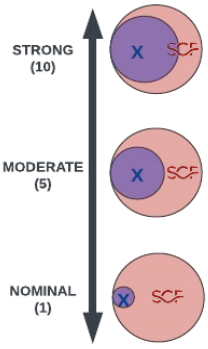


Relationship Type #1: SUBSET OF

Focal Document Element is a subset of SCF control. In other words, SCF control contains everything that Focal Document Element does and more.

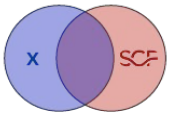


SUBSET OF
Relative Relationship Strength (control versus control)

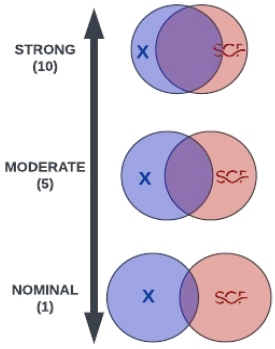


Relationship Type #2: INTERSECTS WITH

SCF control has some overlap with Focal Document Element, but each includes content that the other does not.

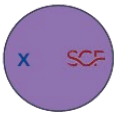


INTERSECTS WITH
Relative Relationship Strength (control versus control)

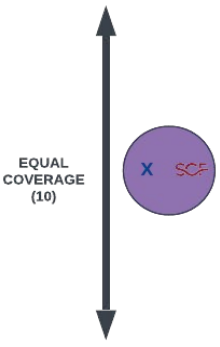


Relationship Type #3: EQUAL

SCF control and Focal Document Element are the same, although not necessarily identical.

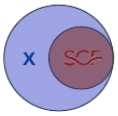


EQUAL
Relative Relationship Strength (control versus control)

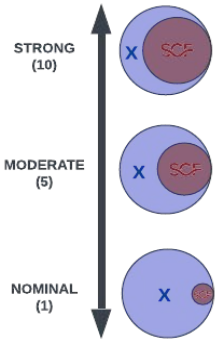


Relationship Type #4: SUPERSET OF

Focal Document Element is a superset of SCF control. In other words, Focal Document Element contains everything that SCF control does and more.

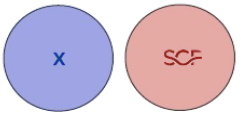


SUPERSET OF
Relative Relationship Strength (control versus control)

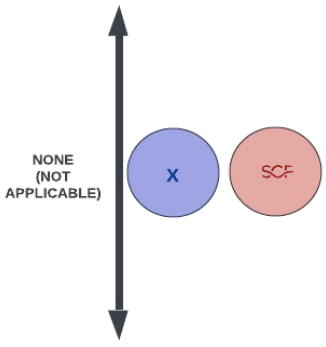


Relationship Type #5: NO RELATIONSHIP

SCF control and Focal Document Element are unrelated; their content does not overlap.



NO RELATIONSHIP
Relative Relationship Strength (control versus control)



FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
A1.1	The entity maintains, monitors, and evaluates current processing capacity and use of system components (infrastructure, data, and software) to manage capacity demand and to enable the implementation of additional capacity to help meet its objectives.	Functional	subset of	Capacity & Performance Management	CAP-01	Mechanisms exist to facilitate the implementation of capacity management controls to ensure optimal system performance to meet expected and anticipated future capacity requirements.	10	
		Functional	intersects with	Resource Priority	CAP-02	Mechanisms exist to control resource utilization of systems that are susceptible to Denial of Service (DoS) attacks to limit and prioritize the use of resources.	5	
		Functional	intersects with	Capacity Planning	CAP-03	Mechanisms exist to conduct capacity planning so that necessary capacity for information processing, telecommunications and environmental support will exist during contingency operations.	5	
A1.1-POF1	Measures Current Usage	Functional	intersects with	Capacity & Performance Management	CAP-01	Mechanisms exist to facilitate the implementation of capacity management controls to ensure optimal system performance to meet expected and anticipated future capacity requirements.	5	
		Functional	subset of	Performance Monitoring	CAP-04	Automated mechanisms exist to centrally-monitor and alert on the operating state and health status of critical systems, applications and services.	10	
A1.1-POF2	Forecasts Capacity	Functional	equal	Capacity Planning	CAP-03	Mechanisms exist to conduct capacity planning so that necessary capacity for information processing, telecommunications and environmental support will exist during contingency operations.	10	
A1.1-POF3	Makes Changes Based on Forecasts	Functional	subset of	Capacity & Performance Management	CAP-01	Mechanisms exist to facilitate the implementation of capacity management controls to ensure optimal system performance to meet expected and anticipated future capacity requirements.	10	
A1.2	The entity authorizes, designs, develops or acquires, implements, operates, approves, maintains, and monitors environmental protections, software, data backup processes, and recovery infrastructure to meet its objectives.	Functional	subset of	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
		Functional	intersects with	Alternate Storage Site	BCD-08	Mechanisms exist to establish an alternate storage site that includes both the assets and necessary agreements to permit the storage and recovery of system backup information.	5	
		Functional	intersects with	Separation from Primary Site	BCD-08.1	Mechanisms exist to separate the alternate storage site from the primary storage site to reduce susceptibility to similar threats.	5	
		Functional	intersects with	Accessibility	BCD-08.2	Mechanisms exist to identify and mitigate potential accessibility problems to the alternate storage site in the event of an area-wide disruption or disaster.	5	
		Functional	intersects with	Alternate Processing Site	BCD-09	Mechanisms exist to establish an alternate processing site that provides security measures equivalent to that of the primary site.	5	
		Functional	intersects with	Separation from Primary Site	BCD-09.1	Mechanisms exist to separate the alternate processing site from the primary processing site to reduce susceptibility to similar threats.	5	
		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.	5	
		Functional	intersects with	Alternate Site Priority of Service	BCD-09.3	Mechanisms exist to address priority-of-service provisions in alternate processing and storage sites that support availability requirements, including Recovery Time Objectives (RTOs).	5	
		Functional	intersects with	Telecommunications Services Availability	BCD-10	Mechanisms exist to reduce the likelihood of a single point of failure with primary telecommunications services.	5	
		Functional	intersects with	Telecommunications Priority of Service Provisions	BCD-10.1	Mechanisms exist to formalize primary and alternate telecommunications service agreements contain priority-of-service provisions that support availability requirements, including Recovery Time Objectives (RTOs).	5	
		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 satisfying Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	5	
		Functional	intersects with	Testing for Reliability & Integrity	BCD-11.1	Mechanisms exist to routinely test backups that verify the reliability of the backup process, as well as the integrity and availability of the data.	5	
		Functional	intersects with	Separate Storage for Critical Information	BCD-11.2	Mechanisms exist to store backup copies of critical software and other security-related information in a separate facility or in a fire-rated container that is not collocated with the system being backed up.	5	
		Functional	intersects with	Information System Imaging	BCD-11.3	Mechanisms exist to reimage assets from configuration-controlled and integrity-protected images that represent a secure, operational state.	5	
		Functional	intersects with	Cryptographic Protection	BCD-11.4	Cryptographic mechanisms exist to prevent the unauthorized disclosure and/or modification of backup information.	5	
		Functional	intersects with	Information System Recovery & Reconstitution	BCD-12	Mechanisms exist to ensure the secure recovery and reconstitution of systems to a known state after a disruption, compromise or failure.	5	
		Functional	intersects with	Transaction Recovery	BCD-12.1	Mechanisms exist to utilize specialized backup mechanisms that will allow transaction recovery for transaction-based applications and services in accordance with Recovery Point Objectives (RPOs).	5	
		Functional	intersects with	Failover Capability	BCD-12.2	Mechanisms exist to implement real-time or near-real-time failover capability to maintain availability of critical systems, applications and/or services.	5	
		Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
		Functional	intersects with	Supporting Utilities	PES-07	Facility security mechanisms exist to protect power equipment and power cabling for the system from damage and destruction.	5	
		Functional	intersects with	Automatic Voltage Controls	PES-07.1	Facility security mechanisms exist to utilize automatic voltage controls for critical system components.	5	
		Functional	intersects with	Emergency Shutoff	PES-07.2	Facility security mechanisms exist to shut off power in emergency situations by: • Placing emergency shutoff switches or devices in close proximity to systems or system components to facilitate safe and easy access for personnel; and • Protecting emergency power shutoff capability from unauthorized activation.	5	
		Functional	intersects with	Emergency Power	PES-07.3	Facility security mechanisms exist to supply alternate power, capable of maintaining minimally-required operational capability, in the event of an extended loss of the primary power source.	5	
		Functional	intersects with	Emergency Lighting	PES-07.4	Facility security mechanisms exist to utilize and maintain automatic emergency lighting that activates in the event of a power outage or disruption and that covers emergency exits and evacuation routes within the facility.	5	
		Functional	intersects with	Water Damage Protection	PES-07.5	Facility security mechanisms exist to protect systems from damage resulting from water leakage by providing master shutoff valves that are accessible, working properly and known to key personnel.	5	
		Functional	intersects with	Fire Protection	PES-08	Facility security mechanisms exist to utilize and maintain fire suppression and detection devices/systems for the system that are supported by an independent energy source.	5	
		Functional	intersects with	Fire Detection Devices	PES-08.1	Facility security mechanisms exist to utilize and maintain fire detection devices/systems that activate automatically and notify organizational personnel and emergency responders in the event of a fire.	5	
		Functional	intersects with	Fire Suppression Devices	PES-08.2	Facility security mechanisms exist to utilize fire suppression devices/systems that provide automatic notification of any activation to organizational personnel and emergency responders.	5	
		Functional	intersects with	Temperature & Humidity Controls	PES-09	Facility security mechanisms exist to maintain and monitor temperature and humidity levels within the facility.	5	
		Functional	intersects with	Monitoring with Alarms / Notifications	PES-09.1	Facility security mechanisms exist to trigger an alarm or notification of temperature and humidity changes that be potentially harmful to personnel or equipment.	5	
		Functional	intersects with	Delivery & Removal	PES-10	Physical security mechanisms exist to isolate information processing facilities from points such as delivery and loading areas and other points to avoid unauthorized access.	5	
		Functional	intersects with	Alternate Work Site	PES-11	Physical security mechanisms exist to utilize appropriate management, operational and technical controls at alternate work sites.	5	
		Functional	intersects with	Equipment Siting & Protection	PES-12	Physical security mechanisms exist to locate system components within the facility to minimize potential damage from physical and environmental hazards and to minimize the opportunity for unauthorized access.	5	
		Functional	intersects with	Information Leakage Due To Electromagnetic Signals Emanations	PES-13	Facility security mechanisms exist to protect the system from information leakage due to electromagnetic signals emanations.	5	
		Functional	intersects with	Electromagnetic Pulse (EMP) Protection	PES-15	Physical security mechanisms exist to employ safeguards against Electromagnetic Pulse (EMP) damage for systems and system components.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
A1.2-POF1	Identifies Environmental Threats	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	subset of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
		Functional	equal	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	10	
A1.2-POF2	Designs Detection Measures	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
		Functional	intersects with	Temperature & Humidity Controls	PES-09	Facility security mechanisms exist to maintain and monitor temperature and humidity levels within the facility.	5	
		Functional	intersects with	Monitoring with Alarms / Notifications	PES-09.1	Facility security mechanisms exist to trigger an alarm or notification of temperature and humidity changes that be potentially harmful to personnel or equipment.	5	
A1.2-POF3	Implements and Maintains Environmental Protection Mechanisms	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	subset of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
A1.2-POF4	Implements Alerts to Analyze Anomalies	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	subset of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
		Functional	intersects with	Temperature & Humidity Controls	PES-09	Facility security mechanisms exist to maintain and monitor temperature and humidity levels within the facility.	5	
		Functional	intersects with	Monitoring with Alarms / Notifications	PES-09.1	Facility security mechanisms exist to trigger an alarm or notification of temperature and humidity changes that be potentially harmful to personnel or equipment.	5	
A1.2-POF5	Responds to Environmental Threat Events	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		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 & data privacy-related incidents.	10	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	subset of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
A1.2-POF6	Communicates and Reviews Detected Environmental Threat Events	Functional	subset of	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
		Functional	subset of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
A1.2-POF7	Determines Data Requiring Backup	Functional	subset of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
		Functional	intersects with	Sensitive / Regulated Data Protection	DCH-01.2	Mechanisms exist to protect sensitive/regulated data wherever it is stored.	5	
		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 satisfying Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	5	
		Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
A1.2-POF8	Performs Data Backup	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 satisfying Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	5	
A1.2-POF9	Addresses Offsite Storage	Functional	intersects with	Alternate Storage Site	BCD-08	Mechanisms exist to establish an alternate storage site that includes both the assets and necessary agreements to permit the storage and recovery of system backup information.	5	
		Functional	intersects with	Separate Storage for Critical Information	BCD-11.2	Mechanisms exist to store backup copies of critical software and other security-related information in a separate facility or in a fire-rated container that is not collocated with the system being backed up.	5	
		Functional	intersects with	Transfer to Alternate Storage Site	BCD-11.6	Mechanisms exist to transfer backup data to the alternate storage site at a rate that is capable of meeting both Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	5	
		Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
A1.2-POF10	Implements Alternate Processing Infrastructure	Functional	subset of	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
		Functional	subset of	Alternate Processing Site	BCD-09	Mechanisms exist to establish an alternate processing site that provides security measures equivalent to that of the primary site.	10	
A1.2-POF11	Considers Data Recoverability	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	intersects with	Achieving Resilience Requirements	SEA-01.2	Mechanisms exist to achieve resilience requirements in normal and adverse situations.	5	
		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	
		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	
A1.3	The entity tests recovery plan procedures supporting system recovery to meet its objectives.	Functional	intersects with	Simulated Events	BCD-03.1	Mechanisms exist to incorporate simulated events into contingency training to facilitate effective response by personnel in crisis situations.	5	
		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	
A1.3-POF1	Implements Business Continuity Plan Testing	Functional	equal	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.	10	
A1.3-POF2	Tests Integrity and Completeness of Backup Data	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	
		Functional	intersects with	Testing for Reliability & Integrity	BCD-11.1	Mechanisms exist to routinely test backups that verify the reliability of the backup process, as well as the integrity and availability of the data.	5	
		Functional	intersects with	Test Restoration Using Sampling	BCD-11.5	Mechanisms exist to utilize sampling of available backups to test recovery capabilities as part of business continuity plan testing.	5	
C1.1	The entity identifies and maintains confidential information to meet the entity's objectives related	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		Functional	intersects with	Data & Asset Classification	DCH-02	Mechanisms exist to ensure data and assets are categorized in accordance with applicable statutory, regulatory and contractual requirements.	5	
		Functional	intersects with	Media Access	DCH-03	Mechanisms exist to control and restrict access to digital and non-digital media to authorized individuals.	5	
C1.1-POF1	Defines and Identifies Confidential information	Functional	intersects with	Network Diagrams & Data Flow Diagrams (DFDs)	AST-04	Mechanisms exist to maintain network architecture diagrams that: • Contain sufficient detail to assess the security of the network's architecture; • Reflect the current architecture of the network environment; and • Document all sensitive/regulated data flows.	5	
		Functional	intersects with	Sensitive Data Inventories	DCH-06.2	Mechanisms exist to maintain inventory logs of all sensitive media and conduct sensitive media inventories at least annually.	5	
C1.1-POF2	Retains Confidential Information	Functional	subset of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
		Functional	intersects with	Sensitive / Regulated Data Protection	DCH-01.2	Mechanisms exist to protect sensitive/regulated data wherever it is stored.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
C1.1-POF3	Protects Confidential Information From Destruction	Functional	subset of	Media & Data Retention	DCH-18	Mechanisms exist to retain media and data in accordance with applicable statutory, regulatory and contractual obligations.	10	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
C1.2	The entity disposes of confidential information to meet the entity's objectives related to confidentiality.	Functional	subset of	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	10	
		Functional	intersects with	Event Log Retention	MON-10	Mechanisms exist to retain event logs for a time period consistent with records retention requirements to provide support for after-the-fact investigations of security incidents and to meet statutory, regulatory and contractual retention requirements.	5	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
C1.2-POF1	Identifies Confidential Information for Destruction	Functional	subset of	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	10	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
C1.2-POF2	Destroys Confidential Information	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	
		Functional	intersects with	Physical Media Disposal	DCH-08	Mechanisms exist to securely dispose of media when it is no longer required, using formal procedures.	5	
		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	
		Functional	intersects with	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	5	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
CC1.1	COSO Principle 1	Functional	subset of	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity & data protection governance controls.	10	
		Functional	intersects with	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	5	
		Functional	intersects with	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 & data protection program.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Terms of Employment	HRS-05	Mechanisms exist to require all employees and contractors to apply cybersecurity & data privacy principles in their daily work.	5	
		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.	5	
		Functional	intersects with	Workplace Investigations	HRS-07.1	Mechanisms exist to conduct employee misconduct investigations when there is reasonable assurance that a policy has been violated.	5	
CC1.1-POF1	Sets the Tone at the Top	Functional	subset of	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity & data protection governance controls.	10	
		Functional	subset of	Business As Usual (BAU) Secure Practices	GOV-14	Mechanisms exist to incorporate cybersecurity & data privacy principles into Business As Usual (BAU) practices through executive leadership involvement.	10	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
CC1.1-POF2	Establishes Standards of Conduct	Functional	equal	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.	10	
CC1.1-POF3	Evaluates Adherence to Standards of Conduct	Functional	subset of	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	10	
		Functional	subset of	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	10	
		Functional	intersects with	Cybersecurity & Data Protection Assessments	CPL-03	Mechanisms exist to ensure managers regularly review the processes and documented procedures within their area of responsibility to adhere to appropriate cybersecurity & data protection policies, standards and other applicable requirements.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
CC1.1-POF4	Addresses Deviations in a Timely Manner	Functional	intersects with	Non-Compliance Oversight	CPL-01.1	Mechanisms exist to document and review instances of non-compliance with statutory, regulatory and/or contractual obligations to develop appropriate risk mitigation actions.	5	
		Functional	intersects with	Personnel Sanctions	HRS-07	Mechanisms exist to sanction personnel failing to comply with established security policies, standards and procedures.	5	
		Functional	intersects with	Risk Remediation	RSK-06	Mechanisms exist to remediate risks to an acceptable level.	5	
CC1.1-POF5	Considers Contractors and Vendor Employees in Demonstrating Its Commitment	Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
		Functional	intersects with	Third-Party Personnel Security	TPM-06	Mechanisms exist to control personnel security requirements including security roles and responsibilities for third-party providers.	5	
CC1.2	COSO Principle 2	Functional	intersects with	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity & data protection governance controls.	5	
		Functional	subset of	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	10	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Key Performance Indicators (KPIs)	GOV-05.1	Mechanisms exist to develop, report and monitor Key Performance Indicators (KPIs) to assist organizational management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		Functional	intersects with	Key Risk Indicators (KRIs)	GOV-05.2	Mechanisms exist to develop, report and monitor Key Risk Indicators (KRIs) to assist senior management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		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	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC1.2-POF1	Establishes Oversight Responsibilities	Functional	subset of	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	10	
		Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
		Functional	intersects with	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the mission of the organization.	5	
		Functional	intersects with	Data Governance	GOV-10	Mechanisms exist to facilitate data governance to oversee the organization's policies, standards and procedures so that sensitive/regulated data is effectively managed and maintained in accordance with applicable statutory, regulatory and contractual obligations.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		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	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
CC1.2-POF2	Applies Relevant Expertise	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		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	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
CC1.2-POF3	Operates Independently	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		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	
CC1.2-POF4	Supplements Board Expertise	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		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	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
CC1.3	COSO Principle 3	Functional	intersects with	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 & data protection program.	5	
		Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC1.3-POF1	Considers All Structures of the Entity	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
CC1.3-POF2	Establishes Reporting Lines	Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
CC1.3-POF3	Defines, Assigns, and Limits Authorities and Responsibilities	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
CC1.3-POF4	Addresses Specific Requirements When Defining Authorities and Responsibilities	Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
CC1.3-POF5	Considers Interactions With External Parties When Establishing Structures, Reporting Lines, Authorities, and	Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
	Responsibilities	Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
CC1.3-POF6	Establishes Structures, Reporting Lines, and Authorities to Support Compliance With Legal and Contractual Privacy Requirements	Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data privacy controls.	5	
		Functional	intersects with	Conflict of Interests	TPM-04.3	Mechanisms exist to ensure that the interests of external service providers are consistent with and reflect organizational interests.	5	
CC1.4	COSO Principle 4	Functional	subset of	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	10	
		Functional	intersects with	Cybersecurity & Data Privacy Resource Management	PRM-02	Mechanisms exist to address all capital planning and investment requests, including the resources needed to implement the cybersecurity & data privacy programs and document all exceptions to this requirement.	5	
		Functional	intersects with	Allocation of Resources	PRM-03	Mechanisms exist to identify and allocate resources for management, operational, technical and data privacy requirements within business process planning for projects / initiatives.	5	
		Functional	intersects with	Cybersecurity & Data Privacy-Minded Workforce	SAT-01	Mechanisms exist to facilitate the implementation of security workforce development and awareness controls.	5	
		Functional	intersects with	Continuing Professional Education (CPE) - Cybersecurity & Data Privacy Personnel	SAT-03.7	Mechanisms exist to ensure cybersecurity & data privacy personnel receive Continuing Professional Education (CPE) training to maintain currency and proficiency with industry-recognized secure practices that are pertinent to their assigned roles and responsibilities.	5	
CC1.4-POF1	Establishes Policies and Practices	Functional	subset of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	10	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
CC1.4-POF2	Evaluates Competence and Addresses Shortcomings	Functional	intersects with	Artificial Intelligence (AI) & Autonomous Technologies Governance	AAT-01	Mechanisms exist to ensure policies, processes, procedures and practices related to the mapping, measuring and managing of Artificial Intelligence (AI) and Autonomous Technologies (AAT)-related risks are in place, transparent and implemented effectively.	5	
		Functional	intersects with	AI & Autonomous Technologies Stakeholder Competencies	AAT-13.1	Mechanisms exist to ensure Artificial Intelligence (AI) and Autonomous Technologies (AAT)-related operator and practitioner proficiency requirements for Artificial Intelligence (AI) and Autonomous Technologies (AAT) are defined, assessed and documented.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Probationary Periods	HRS-02.2	Mechanisms exist to identify newly onboarded personnel for enhanced monitoring during their probationary period.	5	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
		Functional	intersects with	Identify Critical Skills & Gaps	HRS-13	Mechanisms exist to evaluate the critical cybersecurity & data privacy skills needed to support the organization's mission and identify gaps that exist.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
CC1.4-POF3	Attracts, Develops, and Retains Individuals	Functional	intersects with	Robust Stakeholder Engagement for AI & Autonomous Technologies	AAT-11	Mechanisms exist to compel ongoing engagement with relevant Artificial Intelligence (AI) and Autonomous Technologies (AAT) stakeholders to encourage feedback about positive, negative and unanticipated impacts.	5	
		Functional	intersects with	AI & Autonomous Technologies Stakeholder Diversity	AAT-13	Mechanisms exist to ensure Artificial Intelligence (AI) and Autonomous Technologies (AAT) stakeholder competencies, skills and capacities incorporate demographic diversity, broad domain and user experience expertise.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Probationary Periods	HRS-02.2	Mechanisms exist to identify newly onboarded personnel for enhanced monitoring during their probationary period.	5	
		Functional	intersects with	Identify Critical Skills & Gaps	HRS-13	Mechanisms exist to evaluate the critical cybersecurity & data privacy skills needed to support the organization's mission and identify gaps that exist.	5	
		Functional	intersects with	Cybersecurity & Data Privacy-Minded Workforce	SAT-01	Mechanisms exist to facilitate the implementation of security workforce development and awareness controls.	5	
		Functional	intersects with	Continuing Professional Education (CPE) - Cybersecurity & Data Privacy Personnel	SAT-03.7	Mechanisms exist to ensure cybersecurity & data privacy personnel receive Continuing Professional Education (CPE) training to maintain currency and proficiency with industry-recognized secure practices that are pertinent to their assigned roles and responsibilities.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
CC1.4-POF4	Plans and Prepares for Succession	Functional	intersects with	Identify Critical Skills & Gaps	HRS-13	Mechanisms exist to evaluate the critical cybersecurity & data privacy skills needed to support the organization's mission and identify gaps that exist.	5	
		Functional	intersects with	Perform Succession Planning	HRS-13.4	Mechanisms exist to perform succession planning for vital cybersecurity & data privacy roles.	5	
CC1.4-POF5	Considers the Background of Individuals	Functional	equal	Personnel Screening	HRS-04	Mechanisms exist to manage personnel security risk by screening individuals prior to authorizing access.	10	
CC1.4-POF6	Considers the Technical Competency of Individuals	Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	equal	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	10	
CC1.4-POF7	Provides Training to Maintain Technical Competencies	Functional	intersects with	Cybersecurity & Data Privacy 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	
		Functional	intersects with	Role-Based Cybersecurity & Data Privacy Training	SAT-03	Mechanisms exist to provide role-based cybersecurity & data privacy-related training: • Before authorizing access to the system or performing assigned duties; • When required by system changes; and • Annually thereafter.	5	
		Functional	intersects with	Continuing Professional Education (CPE) - Cybersecurity & Data Privacy Personnel	SAT-03.7	Mechanisms exist to ensure cybersecurity & data privacy personnel receive Continuing Professional Education (CPE) training to maintain currency and proficiency with industry-recognized secure practices that are pertinent to their assigned roles and responsibilities.	5	
		Functional	intersects with	Continuing Professional Education (CPE) - DevOps Personnel	SAT-03.8	Mechanisms exist to ensure application development and operations (DevOps) personnel receive Continuing Professional Education (CPE) training on Secure Software Development Practices (SSDP) to appropriately address evolving threats.	5	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Key Performance Indicators (KPIs)	GOV-05.1	Mechanisms exist to develop, report and monitor Key Performance Indicators (KPIs) to assist organizational management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		Functional	intersects with	Key Risk Indicators (KRIs)	GOV-05.2	Mechanisms exist to develop, report and monitor Key Risk Indicators (KRIs) to assist senior management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
		Functional	intersects with	Non-Compliance Oversight	CPL-01.1	Mechanisms exist to document and review instances of non-compliance with statutory, regulatory and/or contractual obligations to develop appropriate risk mitigation actions.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC1.5	COSO Principle 5	Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
		Functional	intersects with	Access Agreements	HRS-06	Mechanisms exist to require internal and third-party users to sign appropriate access agreements prior to being granted access.	5	
		Functional	intersects with	Confidentiality Agreements	HRS-06.1	Mechanisms exist to require Non-Disclosure Agreements (NDAs) or similar confidentiality agreements that reflect the needs to protect data and operational details, or both employees and third-parties.	5	
		Functional	intersects with	Personnel Sanctions	HRS-07	Mechanisms exist to sanction personnel failing to comply with established security policies, standards and procedures.	5	
		Functional	intersects with	Workplace Investigations	HRS-07.1	Mechanisms exist to conduct employee misconduct investigations when there is reasonable assurance that a policy has been violated.	5	
		Functional	intersects with	Personnel Transfer	HRS-08	Mechanisms exist to adjust logical and physical access authorizations to systems and facilities upon personnel reassignment or transfer, in a timely manner.	5	
		Functional	intersects with	Personnel Termination	HRS-09	Mechanisms exist to govern the termination of individual employment.	5	
		Functional	intersects with	Asset Collection	HRS-09.1	Mechanisms exist to retrieve organization-owned assets upon termination of an individual's employment.	5	
		Functional	intersects with	High-Risk Terminations	HRS-09.2	Mechanisms exist to expedite the process of removing "high risk" individual's access to systems and applications upon termination, as determined by management.	5	
		Functional	intersects with	Post-Employment Requirements	HRS-09.3	Mechanisms exist to govern former employee behavior by notifying terminated individuals of applicable, legally binding post-employment requirements for the protection of organizational information.	5	
CC1.5-POF1	Enforces Accountability Through Structures, Authorities, and Responsibilities	Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Authoritative Chain of Command	GOV-04.2	Mechanisms exist to establish an authoritative chain of command with clear lines of communication to remove ambiguity from individuals and teams related to managing data and technology-related risks.	5	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
CC1.5-POF2	Establishes Performance Measures, Incentives, and Rewards	Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	subset of	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	10	
CC1.5-POF3	Evaluates Performance Measures, Incentives, and Rewards for Ongoing Relevance	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
CC1.5-POF4	Considers Excessive Pressures	Functional	subset of	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	10	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
CC1.5-POF5	Evaluates Performance and Rewards or Disciplines Individuals	Functional	subset of	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	10	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Personnel Sanctions	HRS-07	Mechanisms exist to sanction personnel failing to comply with established security policies, standards and procedures.	5	
CC1.5-POF6	Takes Disciplinary Actions	Functional	equal	Personnel Sanctions	HRS-07	Mechanisms exist to sanction personnel failing to comply with established security policies, standards and procedures.	10	
CC2.1	COSO Principle 13	Functional	intersects with	Network Diagrams & Data Flow Diagrams (DFDs)	AST-04	Mechanisms exist to maintain network architecture diagrams that: • Contain sufficient detail to assess the security of the network's architecture; • Reflect the current architecture of the network environment; and • Document all sensitive/regulated data flows.	5	
		Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		Functional	intersects with	Data Stewardship	DCH-01.1	Mechanisms exist to ensure data stewardship is assigned, documented and communicated.	5	
		Functional	intersects with	Data & Asset Classification	DCH-02	Mechanisms exist to ensure data and assets are categorized in accordance with applicable statutory, regulatory and contractual requirements.	5	
		Functional	intersects with	Data Quality Operations	DCH-22	Mechanisms exist to check for Redundant, Obsolete/Outdated, Toxic or Trivial (ROTT) data to ensure the accuracy, relevance, timeliness, impact, completeness and de-identification of information across the information lifecycle.	5	
		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	
CC2.1-POF1	Identifies Information Requirements	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	
		Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		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	
CC2.1-POF2	Captures Internal and External Sources of Data	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		Functional	intersects with	Network Diagrams & Data Flow Diagrams (DFDs)	AST-04	Mechanisms exist to maintain network architecture diagrams that: • Contain sufficient detail to assess the security of the network's architecture; • Reflect the current architecture of the network environment; and • Document all sensitive/regulated data flows.	5	
		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	
CC2.1-POF3	Processes Relevant Data Into Information	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		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	
CC2.1-POF4	Maintains Quality Throughout Processing	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		Functional	intersects with	Data Quality Operations	DCH-22	Mechanisms exist to check for Redundant, Obsolete/Outdated, Toxic or Trivial (ROTT) data to ensure the accuracy, relevance, timeliness, impact, completeness and de-identification of information across the information lifecycle.	5	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		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	
CC2.1-POF5	Documents Data Flow	Functional	intersects with	Data Action Mapping	AST-02.8	Mechanisms exist to create and maintain a map of technology assets where sensitive/regulated data is stored, transmitted or processed.	5	
		Functional	subset of	Network Diagrams & Data Flow Diagrams (DFDs)	AST-04	Mechanisms exist to maintain network architecture diagrams that: • Contain sufficient detail to assess the security of the network's architecture; • Reflect the current architecture of the network environment; and • Document all sensitive/regulated data flows.	10	
CC2.1-POF6	Manages Assets	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	
		Functional	intersects with	Asset Inventories	AST-02	Mechanisms exist to perform inventories of technology assets that: • Accurately reflects the current systems, applications and services in use; • Identifies authorized software products, including business justification details; • Is at the level of granularity deemed necessary for tracking and reporting; • Includes organization-defined information deemed necessary to achieve effective property accountability; and • Is available for review and audit by designated organizational personnel.	5	
		Functional	intersects with	Automated Location Tracking	AST-02.10	Mechanisms exist to track the geographic location of system components.	5	
		Functional	intersects with	Sensitive Data Inventories	DCH-06.2	Mechanisms exist to maintain inventory logs of all sensitive media and conduct sensitive media inventories at least annually.	5	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	intersects with	Third-Party Inventories	TPM-01.1	Mechanisms exist to maintain a current, accurate and complete list of External Service Providers (ESPs) that can potentially impact the Confidentiality, Integrity, Availability and/or Safety (CIAS) of the organization's systems, applications, services and data.	5	
CC2.1-POF7	Classifies Information	Functional	equal	Data & Asset Classification	DCH-02	Mechanisms exist to ensure data and assets are categorized in accordance with applicable statutory, regulatory and contractual requirements.	10	
		Functional	intersects with	Data Reclassification	DCH-11	Mechanisms exist to reclassify data, including associated systems, applications and services, commensurate with the security category and/or classification level of the information.	5	
		Functional	intersects with	Asset Scope Classification	AST-04.1	Mechanisms exist to determine cybersecurity & data privacy control applicability by identifying, assigning and documenting the appropriate asset scope categorization for all systems, applications, services and personnel (internal and third-parties).	5	
CC2.1-POF8	Uses Information That Is Complete and Accurate	Functional	subset of	Data Quality Operations	DCH-22	Mechanisms exist to check for Redundant, Obsolete/Outdated, Toxic or Trivial (ROTT) data to ensure the accuracy, relevance, timeliness, impact, completeness and de-identification of information across the information lifecycle.	10	
CC2.1-POF9	Manages the Location of Assets	Functional	intersects with	Asset Governance	AST-01	Mechanisms exist to facilitate an IT Asset Management (ITAM) program to implement and manage asset management controls.	5	
		Functional	intersects with	Asset Inventories	AST-02	Mechanisms exist to perform inventories of technology assets that: • Accurately reflects the current systems, applications and services in use; • Identifies authorized software products, including business justification details; • Is at the level of granularity deemed necessary for tracking and reporting; • Includes organization-defined information deemed necessary to achieve effective property accountability; and • Is available for review and audit by designated organizational personnel.	5	
		Functional	intersects with	Data Action Mapping	AST-02.8	Mechanisms exist to create and maintain a map of technology assets where sensitive/regulated data is stored, transmitted or processed.	5	
		Functional	intersects with	Automated Location Tracking	AST-02.10	Mechanisms exist to track the geographic location of system components.	5	
		Functional	intersects with	Data Storage Location Reviews	BCD-02.4	Mechanisms exist to perform periodic security reviews of storage locations that contain sensitive / regulated data.	5	
		Functional	intersects with	Geolocation Requirements for Processing, Storage and Service Locations	CLD-09	Mechanisms exist to control the location of cloud processing/storage based on business requirements that includes statutory, regulatory and contractual obligations.	5	
		Functional	intersects with	Geographic Location of Data	DCH-19	Mechanisms exist to inventory, document and maintain data flows for data that is resident (permanently or temporarily) within a service's geographically distributed applications (physical and virtual), infrastructure, systems components and/or shared with other third-parties.	5	
		Functional	intersects with	Information Location	DCH-24	Mechanisms exist to identify and document the location of information and the specific system components on which the information resides.	5	
		Functional	intersects with	Change Processing & Storage Locations	SEA-14.2	Automated mechanisms exist to change the location of processing and/or storage at random time intervals.	5	
		Functional	intersects with	Third-Party Processing, Storage and Service Locations	TPM-04.4	Mechanisms exist to restrict the location of information processing/storage based on business requirements.	5	
CC2.2	COSO Principle 14	Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
		Functional	intersects with	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	5	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Key Performance Indicators (KPIs)	GOV-05.1	Mechanisms exist to develop, report and monitor Key Performance Indicators (KPIs) to assist organizational management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		Functional	intersects with	Key Risk Indicators (KRIs)	GOV-05.2	Mechanisms exist to develop, report and monitor Key Risk Indicators (KRIs) to assist senior management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		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	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	intersects with	Operations Security	OPS-01	Mechanisms exist to facilitate the implementation of operational security controls.	5	
		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	
		Functional	intersects with	Cybersecurity & Data Privacy Portfolio Management	PRM-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy-related resource planning controls that define a viable plan for achieving cybersecurity & data privacy objectives.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Requirements Definition	PRM-05	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical systems, system components or services at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
		Functional	intersects with	Standardized Terminology	SEA-02.1	Mechanisms exist to standardize technology and process terminology to reduce confusion amongst groups and departments.	5	
CC2.2-POF1	Communicates Internal Control Information	Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		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	
		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	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC2.2-POF2	Communicates With the Board of Directors	Functional	equal	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	10	
CC2.2-POF3	Provides Separate Communication Lines	Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Workplace Investigations	HRS-07.1	Mechanisms exist to conduct employee misconduct investigations when there is reasonable assurance that a policy has been violated.	5	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
CC2.2-POF4	Selects Relevant Method of Communication	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Contacts With Authorities	GOV-06	Mechanisms exist to identify and document appropriate contacts with relevant law enforcement and regulatory bodies.	5	
		Functional	intersects with	Contacts With Groups & Associations	GOV-07	Mechanisms exist to establish contact with selected groups and associations within the cybersecurity & data privacy communities to: • Facilitate ongoing cybersecurity & data privacy education and training for organizational personnel; • Maintain currency with recommended cybersecurity & data privacy practices, techniques and technologies; and • Share current cybersecurity and/or data privacy-related information including threats, vulnerabilities and incidents.	5	
CC2.2-POF5	Communicates Responsibilities	Functional	equal	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	10	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
CC2.2-POF6	Communicates Information on Reporting Failures, Incidents, Concerns, and Other Matters	Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Integrated Security Incident Response Team (ISIRT)	IRO-07	Mechanisms exist to establish an integrated team of cybersecurity, IT and business function representatives that are capable of addressing cybersecurity & data privacy incident response operations.	5	
		Functional	intersects with	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity & data privacy incidents to internal stakeholders all the way through the resolution of the incident.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
		Functional	intersects with	Coordination With External Providers	IRO-11.2	Mechanisms exist to establish a direct, cooperative relationship between the organization's incident response capability and external service providers.	5	
CC2.2-POF7	Communicates Objectives and Changes to Objectives	Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		Functional	intersects with	Periodic Review & Update of Cybersecurity & Data Protection Program	GOV-03	Mechanisms exist to review the cybersecurity & data privacy program, including policies, standards and procedures, at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	5	
		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	
CC2.2-POF8	Communicates Information to Improve Security Knowledge and Awareness	Functional	intersects with	Cybersecurity & Data Privacy-Minded Workforce	SAT-01	Mechanisms exist to facilitate the implementation of security workforce development and awareness controls.	5	
		Functional	intersects with	Cybersecurity & Data Privacy 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	
		Functional	intersects with	Cyber Threat Environment	SAT-03.6	Mechanisms exist to provide role-based cybersecurity & data privacy awareness training that is specific to the cyber threats that the user might encounter the user's specific day-to-day business operations.	5	
CC2.2-POF9	Communicates Information to Improve Privacy Knowledge and Awareness	Functional	intersects with	Sensitive Information Storage, Handling & Processing	SAT-03.3	Mechanisms exist to ensure that every user accessing a system processing, storing or transmitting sensitive information is formally trained in data handling requirements.	5	
		Functional	intersects with	Privileged Users	SAT-03.5	Mechanisms exist to provide specific training for privileged users to ensure privileged users understand their unique roles and responsibilities	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
		Functional	intersects with	Third-Party Scope Review	TPM-05.5	Mechanisms exist to perform recurring validation of the Responsible, Accountable, Supportive, Consulted & Informed (RASCI) matrix, or similar documentation, to ensure cybersecurity & data privacy control assignments accurately reflect current business practices, compliance obligations, technologies and stakeholders.	5	
		Functional	intersects with	Attack Surface Scope	VPM-01.1	Mechanisms exist to define and manage the scope for its attack surface management activities.	5	
CC2.2-POF10	Communicates Incident Reporting Methods	Functional	intersects with	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the mission of the organization.	5	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Classification & Prioritization	IRO-02.4	Mechanisms exist to identify classes of incidents and actions to take to ensure the continuation of organizational missions and business functions.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC2.2-POF11	Communicates Information About System Operation and Boundaries	Functional	intersects with	Asset Scope Classification	AST-04.1	Mechanisms exist to determine cybersecurity & data privacy control applicability by identifying, assigning and documenting the appropriate asset scope categorization for all systems, applications, services and personnel (internal and third-parties).	5	
		Functional	intersects with	Control Applicability Boundary Graphical Representation	AST-04.2	Mechanisms exist to ensure control applicability is appropriately-determined for systems, applications, services and third parties by graphically representing applicable boundaries.	5	
		Functional	intersects with	Compliance Scope	CPL-01.2	Mechanisms exist to document and validate the scope of cybersecurity & data privacy controls that are determined to meet statutory, regulatory and/or contractual compliance obligations.	5	
		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 data and systems under review.	5	
		Functional	intersects with	System Security & Privacy Plan (SSPP)	IAO-03	Mechanisms exist to generate System Security & Privacy Plans (SSPPs), or similar document repositories, to identify and maintain key architectural information on each critical system, application or service, as well as influence inputs, entities, systems, applications and processes, providing a historical record of the data and its origins.	5	
CC2.2-POF12	Communicates System Objectives	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Cybersecurity & Data Privacy-Minded Workforce	SAT-01	Mechanisms exist to facilitate the implementation of security workforce development and awareness controls.	5	
		Functional	intersects with	Cybersecurity & Data Privacy 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	
		Functional	intersects with	Role-Based Cybersecurity & Data Privacy Training	SAT-03	Mechanisms exist to provide role-based cybersecurity & data privacy-related training: • Before authorizing access to the system or performing assigned duties; • When required by system changes; and • Annually thereafter.	5	
		Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC2.2-POF13	Communicates System Changes	Functional	intersects with	Stakeholder Notification of Changes	CHG-05	Mechanisms exist to ensure stakeholders are made aware of and understand the impact of proposed changes.	5	
		Functional	intersects with	Role-Based Cybersecurity & Data Privacy Training	SAT-03	Mechanisms exist to provide role-based cybersecurity & data privacy-related training: • Before authorizing access to the system or performing assigned duties; • When required by system changes; and • Annually thereafter.	5	
		Functional	intersects with	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.	5	
CC2.3	COSO Principle 15	Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
		Functional	intersects with	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	5	
		Functional	intersects with	Contacts With Authorities	GOV-06	Mechanisms exist to identify and document appropriate contacts with relevant law enforcement and regulatory bodies.	5	
		Functional	intersects with	Contacts With Groups & Associations	GOV-07	Mechanisms exist to establish contact with selected groups and associations within the cybersecurity & data privacy communities to: • Facilitate ongoing cybersecurity & data privacy education and training for organizational personnel; • Maintain currency with recommended cybersecurity & data privacy practices, techniques and technologies; and • Share current cybersecurity and/or data privacy-related information including threats, vulnerabilities and incidents.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Regulatory & Law Enforcement Contacts	IRO-14	Mechanisms exist to maintain incident response contacts with applicable regulatory and law enforcement agencies.	5	
		Functional	intersects with	Data Privacy Records & Reporting	PRI-14	Mechanisms exist to maintain data privacy-related records and develop, disseminate and update reports to internal senior management, as well as external oversight bodies, as appropriate, to demonstrate accountability with specific statutory and regulatory data privacy program mandates.	5	
CC2.3-POF1	Communicates to External Parties	Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
		Functional	intersects with	Supply Chain Coordination	IRO-10.4	Mechanisms exist to provide cybersecurity & data privacy incident information to the provider of the product or service and other organizations involved in the supply chain for systems or system components related to the incident.	5	
CC2.3-POF2	Enables Inbound Communications	Functional	intersects with	Coordination With External Providers	IRO-11.2	Mechanisms exist to establish a direct, cooperative relationship between the organization's incident response capability and external service providers.	5	
		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	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
CC2.3-POF3	Communicates With the Board of Directors	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
CC2.3-POF4	Provides Separate Communication Lines	Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	intersects with	Workplace Investigations	HRS-07.1	Mechanisms exist to conduct employee misconduct investigations when there is reasonable assurance that a policy has been violated.	5	
CC2.3-POF5	Selects Relevant Method of Communication	Functional	intersects with	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity & data protection governance controls.	5	
		Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
		Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
CC2.3-POF6	Communicates Objectives Related to Confidentiality and Changes to Those Objectives	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	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
CC2.3-POF7	Communicates Objectives Related to Privacy and Changes to Those Objectives	Functional	intersects with	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data privacy controls.	5	
		Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
CC2.3-POF8	Communicates Incident Reporting Methods	Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity & data privacy incidents to internal stakeholders all the way through the resolution of the incident.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
CC2.3-POF9	Communicates Information About System Operation and Boundaries	Functional	subset of	System Security & Privacy Plan (SSPP)	IAO-03	Mechanisms exist to generate System Security & Privacy Plans (SSPPs), or similar document repositories, to identify and maintain key architectural information on each critical system, application or service, as well as influence inputs, entities, systems, applications and processes, providing a historical record of the data and its origins.	10	
		Functional	subset of	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	10	
		Functional	subset of	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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	10	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC2.3-POF10	Communicates System Objectives	Functional	intersects with	System Security & Privacy Plan (SSPP)	IAO-03	Mechanisms exist to generate System Security & Privacy Plans (SSPPs), or similar document repositories, to identify and maintain key architectural information on each critical system, application or service, as well as influence inputs, entities, systems, applications and processes, providing a historical record of the data and its origins.	5	
		Functional	intersects with	Technology Development & Acquisition	TDA-01	Mechanisms exist to facilitate the implementation of tailored development and acquisition strategies, contract tools and procurement methods to meet unique business needs.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
CC2.3-POF11	Communicates System Responsibilities	Functional	intersects with	System Security & Privacy Plan (SSPP)	IAO-03	Mechanisms exist to generate System Security & Privacy Plans (SSPPs), or similar document repositories, to identify and maintain key architectural information on each critical system, application or service, as well as influence inputs, entities, systems, applications and processes, providing a historical record of the data and its origins.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	subset of	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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	10	
CC2.3-POF12	Communicates Information on Reporting System Failures, Incidents, Concerns, and Other Matters	Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
		Functional	intersects with	Coordination With External Providers	IRO-11.2	Mechanisms exist to establish a direct, cooperative relationship between the organization's incident response capability and external service providers.	5	
		Functional	intersects with	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.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	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 systems, applications and/or services that the organization utilizes.	5	
		Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity & data privacy requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
CC3.1	COSO Principle 6	Functional	subset of	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.	10	
		Functional	intersects with	Cybersecurity & Data Privacy Portfolio Management	PRM-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy-related resource planning controls that define a viable plan for achieving cybersecurity & data privacy objectives.	5	
		Functional	intersects with	Cybersecurity & Data Privacy In Project Management	PRM-04	Mechanisms exist to assess cybersecurity & data privacy controls in system project development to determine the extent to which the controls are implemented correctly, operating as intended and producing the desired outcome with respect to meeting the requirements.	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		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 & data privacy principles that addresses risk to organizational operations, assets, individuals, other organizations.	5	
CC3.1-POF1	Reflects Management's Choices	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	
		Functional	intersects with	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the mission of the organization.	5	
		Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	intersects with	Risk Tolerance	RSK-01.3	Mechanisms exist to define organizational risk tolerance, the specified range of acceptable results.	5	
		Functional	intersects with	Risk Threshold	RSK-01.4	Mechanisms exist to define organizational risk threshold, the level of risk exposure above which risks are addressed and below which risks may be accepted.	5	
		Functional	intersects with	Risk Appetite	RSK-01.5	Mechanisms exist to define organizational risk appetite, the degree of uncertainty the organization is willing to accept in anticipation of a reward.	5	
CC3.1-POF2	Considers Tolerances for Risk	Functional	equal	Risk Tolerance	RSK-01.3	Mechanisms exist to define organizational risk tolerance, the specified range of acceptable results.	10	
		Functional	intersects with	Risk Threshold	RSK-01.4	Mechanisms exist to define organizational risk threshold, the level of risk exposure above which risks are addressed and below which risks may be accepted.	5	
		Functional	intersects with	Risk Appetite	RSK-01.5	Mechanisms exist to define organizational risk appetite, the degree of uncertainty the organization is willing to accept in anticipation of a reward.	5	
CC3.1-POF3	Includes Operations and Financial Performance Goals	Functional	intersects with	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the mission of the organization.	5	
		Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
CC3.1-POF4	Forms a Basis for Committing of Resources	Functional	intersects with	Cybersecurity & Data Privacy Portfolio Management	PRM-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy-related resource planning controls that define a viable plan for achieving cybersecurity & data privacy objectives.	5	
		Functional	intersects with	Allocation of Resources	PRM-03	Mechanisms exist to identify and allocate resources for management, operational, technical and data privacy requirements within business process planning for projects / initiatives.	5	
CC3.1-POF5	Complies With Applicable Accounting Standards	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
CC3.1-POF6	Considers Materiality	Functional	intersects with	Materiality Determination	GOV-16	Mechanisms exist to define materiality threshold criteria capable of designating an incident as material to the organization.	5	
		Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	intersects with	Risk Ranking	RSK-05	Mechanisms exist to identify and assign a risk ranking to newly discovered security vulnerabilities that is based on industry-recognized practices.	5	
CC3.1-POF7	Reflects Entity Activities	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC3.1-POF8	Complies With Externally Established Frameworks	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	
		Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF9	Considers the Required Level of Precision	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	
		Functional	intersects with	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF10	Reflects Entity Activities	Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
		Functional	intersects with	Contacts With Authorities	GOV-06	Mechanisms exist to identify and document appropriate contacts with relevant law enforcement and regulatory bodies.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Status Reporting	GOV-17	Mechanisms exist to submit status reporting of the organization's cybersecurity and/or data privacy program to applicable statutory and/or regulatory authorities, as required.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF11	Reflects Management's Choices	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF12	Considers the Required Level of Precision	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF13	Reflects Entity Activities	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF14	Reflects External Laws and Regulations	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	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
CC3.1-POF15	Considers Tolerances for Risk	Functional	intersects with	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the mission of the organization.	5	
		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	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Risk Tolerance	RSK-01.3	Mechanisms exist to define organizational risk tolerance, the specified range of acceptable results.	5	
		Functional	intersects with	Risk Threshold	RSK-01.4	Mechanisms exist to define organizational risk threshold, the level of risk exposure above which risks are addressed and below which risks may be accepted.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Risk Appetite	RSK-01.5	Mechanisms exist to define organizational risk appetite, the degree of uncertainty the organization is willing to accept in anticipation of a reward.	5	
CC3.1-POF16	Establishes Sub-Objectives for Risk Assessment	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		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 systems and data.	5	
CC3.2	Considers Tolerances for Risk	Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	equal	Risk Tolerance	RSK-01.3	Mechanisms exist to define organizational risk tolerance, the specified range of acceptable results.	10	
		Functional	intersects with	Risk-Based Security Categorization	RSK-02	Mechanisms exist to categorize systems and data in accordance with applicable local, state and Federal laws that: • Document the security categorization results (including supporting rationale) in the security plan for systems; and • Ensure the security categorization decision is reviewed and approved by the asset owner.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		Functional	intersects with	Business Impact Analysis (BIA)	RSK-08	Mechanisms exist to conduct a Business Impact Analysis (BIA) to identify and assess cybersecurity and data protection risks.	5	
		Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on systems, applications and services that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
CC3.2-POF1	Includes Entity, Subsidiary, Division, Operating Unit, and Functional Levels	Functional	subset of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
CC3.2-POF2	Analyzes Internal and External Factors	Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	subset of	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	10	
		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 systems and data.	5	
CC3.2-POF3	Involves Appropriate Levels of Management	Functional	intersects with	Cybersecurity & Data Privacy Status Reporting	GOV-17	Mechanisms exist to submit status reporting of the organization's cybersecurity and/or data privacy program to applicable statutory and/or regulatory authorities, as required.	5	
		Functional	subset of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
		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 systems and data.	10	
CC3.2-POF4	Estimates Significance of Risks Identified	Functional	intersects with	Impact-Level Prioritization	RSK-02.1	Mechanisms exist to prioritize the impact level for systems, applications and/or services to prevent potential disruptions.	5	
		Functional	intersects with	Risk Ranking	RSK-05	Mechanisms exist to identify and assign a risk ranking to newly discovered security vulnerabilities that is based on industry-recognized practices.	5	
CC3.2-POF5	Determines How to Respond to Risks	Functional	subset of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
		Functional	equal	Risk Response	RSK-06.1	Mechanisms exist to respond to findings from cybersecurity & data privacy assessments, incidents and audits to ensure proper remediation has been performed.	10	
CC3.2-POF6	Identifies Threats - The entity identifies threats to the achievement of its objectives from intentional (including malicious) and unintentional acts and environmental events.	Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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	
		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 systems and data.	5	
		Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	intersects with	Indicators of Exposure (IOE)	THR-02	Mechanisms exist to develop Indicators of Exposure (IOE) to understand the potential attack vectors that attackers could use to attack the organization.	5	
		Functional	intersects with	Threat Intelligence Feeds	THR-03	Mechanisms exist to maintain situational awareness of evolving threats by leveraging the knowledge of attacker tactics, techniques and procedures to facilitate the implementation of preventative and compensating controls.	5	
		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	
		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	
CC3.2-POF7	Identifies Vulnerability of System Components	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	intersects with	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	5	
		Functional	intersects with	Indicators of Exposure (IOE)	THR-02	Mechanisms exist to develop Indicators of Exposure (IOE) to understand the potential attack vectors that attackers could use to attack the organization.	5	
		Functional	intersects with	Threat Intelligence Feeds	THR-03	Mechanisms exist to maintain situational awareness of evolving threats by leveraging the knowledge of attacker tactics, techniques and procedures to facilitate the implementation of preventative and compensating controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Vulnerability & Patch Management Program (VPMP)	VPM-01	Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls.	5	
		Functional	intersects with	Attack Surface Scope	VPM-01.1	Mechanisms exist to define and manage the scope for its attack surface management activities.	5	
		Functional	intersects with	Vulnerability Scanning	VPM-06	Mechanisms exist to detect vulnerabilities and configuration errors by recurring vulnerability scanning of systems and web applications.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC3.2-POF8	Analyzes Threats and Vulnerabilities From Vendors, Business Partners, and Other Parties	Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	intersects with	Risk Tolerance	RSK-01.3	Mechanisms exist to define organizational risk tolerance, the specified range of acceptable results.	5	
		Functional	intersects with	Risk Threshold	RSK-01.4	Mechanisms exist to define organizational risk threshold, the level of risk exposure above which risks are addressed and below which risks may be accepted.	5	
		Functional	intersects with	Risk Appetite	RSK-01.5	Mechanisms exist to define organizational risk appetite, the degree of uncertainty the organization is willing to accept in anticipation of a reward.	5	
		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 systems and data.	5	
		Functional	intersects with	Risk Ranking	RSK-05	Mechanisms exist to identify and assign a risk ranking to newly discovered security vulnerabilities that is based on industry-recognized practices.	5	
		Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Third-Party Criticality Assessments	TPM-02	Mechanisms exist to identify, prioritize and assess suppliers and partners of critical systems, components and services using a supply chain risk assessment process relative to their importance in supporting the delivery of high-value services.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
		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 & data privacy controls, including any flow-down requirements to subcontractors.	5	
CC3.2-POF9	Assesses the Significance of the Risks	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 systems and data.	5	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	intersects with	Third-Party Criticality Assessments	TPM-02	Mechanisms exist to identify, prioritize and assess suppliers and partners of critical systems, components and services using a supply chain risk assessment process relative to their importance in supporting the delivery of high-value services.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
		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	
		Functional	intersects with	Vulnerability & Patch Management Program (VPMP)	VPM-01	Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls.	5	
		Functional	intersects with	Attack Surface Scope	VPM-01.1	Mechanisms exist to define and manage the scope for its attack surface management activities.	5	
		Functional	intersects with	Vulnerability Exploitation Analysis	VPM-03.1	Mechanisms exist to identify, assess, prioritize and document the potential impact(s) and likelihood(s) of applicable internal and external threats exploiting known vulnerabilities.	5	
CC3.3	COSO Principle 8	Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	intersects with	Indicators of Exposure (IOE)	THR-02	Mechanisms exist to develop Indicators of Exposure (IOE) to understand the potential attack vectors that attackers could use to attack the organization.	5	
		Functional	intersects with	Insider Threat Program	THR-04	Mechanisms exist to implement an insider threat program that includes a cross-discipline insider threat incident handling team.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Acquisition Strategies, Tools & Methods	TPM-03.1	Mechanisms exist to utilize tailored acquisition strategies, contract tools and procurement methods for the purchase of unique systems, system components or services.	5	
		Functional	intersects with	Third-Party Services	TPM-04	Mechanisms exist to mitigate the risks associated with third-party access to the organization's systems and data.	5	
		Functional	intersects with	Conflict of Interests	TPM-04.3	Mechanisms exist to ensure that the interests of external service providers are consistent with and reflect organizational interests.	5	
CC3.3-POF1	Considers Various Types of Fraud	Functional	intersects with	Asset Governance	AST-01	Mechanisms exist to facilitate an IT Asset Management (ITAM) program to implement and manage asset management controls.	5	
		Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	intersects with	Insider Threat Program	THR-04	Mechanisms exist to implement an insider threat program that includes a cross-discipline insider threat incident handling team.	5	
CC3.3-POF2	Assesses Incentives and Pressures	Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	subset of	Insider Threat Program	THR-04	Mechanisms exist to implement an insider threat program that includes a cross-discipline insider threat incident handling team.	10	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC3.3-POF3	Assesses Opportunities	Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	subset of	Insider Threat Program	THR-04	Mechanisms exist to implement an insider threat program that includes a cross-discipline insider threat incident handling team.	10	
CC3.3-POF4	Assesses Attitudes and Rationalizations	Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	subset of	Insider Threat Program	THR-04	Mechanisms exist to implement an insider threat program that includes a cross-discipline insider threat incident handling team.	10	
CC3.3-POF5	Considers the Risks Related to the Use of IT and Access to Information	Functional	intersects with	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	5	
		Functional	subset of	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	10	
		Functional	subset of	Insider Threat Program	THR-04	Mechanisms exist to implement an insider threat program that includes a cross-discipline insider threat incident handling team.	10	
CC3.4	COSO Principle 9	Functional	subset of	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	10	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Representative for Asset Lifecycle Changes	CHG-02.3	Mechanisms exist to include a cybersecurity and/or data privacy representative in the configuration change control review process.	5	
		Functional	intersects with	Security Impact Analysis for Changes	CHG-03	Mechanisms exist to analyze proposed changes for potential security impacts, prior to the implementation of the change.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Portfolio Management	PRM-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy-related resource planning controls that define a viable plan for achieving cybersecurity & data privacy objectives.	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
		Functional	intersects with	Managing Changes To Third-Party Services	TPM-10	Mechanisms exist to control changes to services by suppliers, taking into account the criticality of business information, systems and processes that are in scope by the third-party.	5	
CC3.4-POF1	Assesses Changes in the External Environment	Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
CC3.4-POF2	Assesses Changes in the Business Model	Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
CC3.4-POF3	Assesses Changes in Leadership	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
CC3.4-POF4	Assesses Changes in Systems and Technology	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Security Impact Analysis for Changes	CHG-03	Mechanisms exist to analyze proposed changes for potential security impacts, prior to the implementation of the change.	5	
		Functional	subset of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
CC3.4-POF5	Assesses Changes in Vendor and Business Partner Relationships	Functional	subset of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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 systems and data.	5	
		Functional	subset of	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	10	
		Functional	intersects with	Third-Party Scope Review	TPM-05.5	Mechanisms exist to perform recurring validation of the Responsible, Accountable, Supportive, Consulted & Informed (RASCI) matrix, or similar documentation, to ensure cybersecurity & data privacy control assignments accurately reflect current business practices, compliance obligations, technologies and stakeholders.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
		Functional	intersects with	Managing Changes To Third-Party Services	TPM-10	Mechanisms exist to control changes to services by suppliers, taking into account the criticality of business information, systems and processes that are in scope by the third-party.	5	
CC3.4-POF6	Assesses Changes in Threats and Vulnerabilities	Functional	intersects with	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	5	
		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	
		Functional	intersects with	Vulnerability & Patch Management Program (VPMP)	VPM-01	Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls.	5	
		Functional	intersects with	Attack Surface Scope	VPM-01.1	Mechanisms exist to define and manage the scope for its attack surface management activities.	5	
		Functional	intersects with	Vulnerability Ranking	VPM-03	Mechanisms exist to identify and assign a risk ranking to newly discovered security vulnerabilities using reputable outside sources for security vulnerability information.	5	
		Functional	intersects with	Vulnerability Exploitation Analysis	VPM-03.1	Mechanisms exist to identify, assess, prioritize and document the potential impact(s) and likelihood(s) of applicable internal and external threats exploiting known vulnerabilities.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Vulnerability Scanning	VPM-06	Mechanisms exist to detect vulnerabilities and configuration errors by recurring vulnerability scanning of systems and web applications.	5	
CC4.1	COSO Principle 16	Functional	intersects with	Cybersecurity & Data Protection Assessments	CPL-03	Mechanisms exist to ensure managers regularly review the processes and documented procedures within their area of responsibility to adhere to appropriate cybersecurity & data protection policies, standards and other applicable requirements.	5	
		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 & data protection policies and standards.	5	
		Functional	intersects with	Audit Activities	CPL-04	Mechanisms exist to thoughtfully plan audits by including input from operational risk and compliance partners to minimize the impact of audit-related activities on business operations.	5	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Key Performance Indicators (KPIs)	GOV-05.1	Mechanisms exist to develop, report and monitor Key Performance Indicators (KPIs) to assist organizational management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		Functional	intersects with	Key Risk Indicators (KRIs)	GOV-05.2	Mechanisms exist to develop, report and monitor Key Risk Indicators (KRIs) to assist senior management in performance monitoring and trend analysis of the cybersecurity & data privacy program.	5	
		Functional	intersects with	Information Assurance (IA) Operations	IAO-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy assessment and authorization controls.	5	
		Functional	intersects with	Assessments	IAO-02	Mechanisms exist to formally assess the cybersecurity & data privacy controls in systems, applications and services 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.	5	
		Functional	intersects with	Assessor Independence	IAO-02.1	Mechanisms exist to ensure assessors or assessment teams have the appropriate independence to conduct cybersecurity & data privacy control assessments.	5	
		Functional	intersects with	Specialized Assessments	IAO-02.2	Mechanisms exist to conduct specialized assessments for: • Statutory, regulatory and contractual compliance obligations; • Monitoring capabilities; • Mobile devices; • Databases; • Application security; • Embedded technologies (e.g., IoT, OT, etc.); • Vulnerability management; • Malicious code; • Insider threats and • Performance/load testing.	5	
		Functional	intersects with	Plan / Coordinate with Other Organizational Entities	IAO-03.1	Mechanisms exist to plan and coordinate Information Assurance Program (IAP) activities with affected stakeholders before conducting such activities in order to reduce the potential impact on operations.	5	
		Functional	intersects with	Threat Analysis & Flaw Remediation During Development	IAO-04	Mechanisms exist to require system developers and integrators to create and execute a Security Test and Evaluation (ST&E) plan to identify and remediate flaws during development.	5	
		Functional	intersects with	Technical Verification	IAO-06	Mechanisms exist to perform Information Assurance Program (IAP) activities to evaluate the design, implementation and effectiveness of technical cybersecurity & data privacy controls.	5	
		Functional	intersects with	Allocation of Resources	PRM-03	Mechanisms exist to identify and allocate resources for management, operational, technical and data privacy requirements within business process planning for projects / initiatives.	5	
		Functional	intersects with	Cybersecurity & Data Privacy In Project Management	PRM-04	Mechanisms exist to assess cybersecurity & data privacy controls in system project development to determine the extent to which the controls are implemented correctly, operating as intended and producing the desired outcome with respect to meeting the requirements.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Requirements Definition	PRM-05	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical systems, system components or services at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		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 & data privacy principles that addresses risk to organizational operations, assets, individuals, other organizations.	5	
CC4.1-POF1	Considers a Mix of Ongoing and Separate Evaluations	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Testing Throughout Development	TDA-09	Mechanisms exist to require system developers/integrators consult with cybersecurity & data privacy personnel to: • Create and implement a Security Test and Evaluation (ST&E) plan; • Implement a verifiable flaw remediation process to correct weaknesses and deficiencies identified during the security testing and evaluation process; and • Document the results of the security testing/evaluation and flaw remediation processes.	5	
CC4.1-POF2	Considers Rate of Change	Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
CC4.1-POF3	Establishes Baseline Understanding	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
CC4.1-POF4	Uses Knowledgeable Personnel	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
		Functional	intersects with	Specialized Assessments	IAO-02.2	Mechanisms exist to conduct specialized assessments for: • Statutory, regulatory and contractual compliance obligations; • Monitoring capabilities; • Mobile devices; • Databases; • Application security; • Embedded technologies (e.g., IoT, OT, etc.); • Vulnerability management; • Malicious code; • Insider threats and • Performance/load testing.	5	
CC4.1-POF5	Integrates With Business Processes	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
CC4.1-POF6	Adjusts Scope and Frequency	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
CC4.1-POF7	Objectively Evaluates	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
CC4.1-POF8	Considers Different Types of Ongoing and Separate Evaluations	Functional	intersects with	Internal Audit Function	CPL-02.1	Mechanisms exist to implement an internal audit function that is capable of providing senior organization management with insights into the appropriateness of the organization's technology and information governance processes.	5	
		Functional	intersects with	Information Assurance (IA) Operations	IAO-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy assessment and authorization controls.	5	
		Functional	intersects with	Assessments	IAO-02	Mechanisms exist to formally assess the cybersecurity & data privacy controls in systems, applications and services 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.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC4.2	COSO Principle 17	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
		Functional	intersects with	Non-Compliance Oversight	CPL-01.1	Mechanisms exist to document and review instances of non-compliance with statutory, regulatory and/or contractual obligations to develop appropriate risk mitigation actions.	5	
		Functional	intersects with	Threat Analysis & Flaw Remediation During Development	IAO-04	Mechanisms exist to require system developers and integrators to create and execute a Security Test and Evaluation (ST&E) plan to identify and remediate flaws during development.	5	
		Functional	intersects with	Plan of Action & Milestones (POA&M)	IAO-05	Mechanisms exist to generate a Plan of Action and Milestones (POA&M), or similar risk register, to document planned remedial actions to correct weaknesses or deficiencies noted during the assessment of the security controls and to reduce or eliminate known vulnerabilities.	5	
		Functional	intersects with	Risk Remediation	RSK-06	Mechanisms exist to remediate risks to an acceptable level.	5	
		Functional	intersects with	Developer Threat Analysis & Flaw Remediation	TDA-15	Mechanisms exist to require system developers and integrators to create a Security Test and Evaluation (ST&E) plan and implement the plan under the witness of an independent party.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
		Functional	intersects with	Vulnerability Remediation Process	VPM-02	Mechanisms exist to ensure that vulnerabilities are properly identified, tracked and remediated.	5	
		Functional	intersects with	Continuous Vulnerability Remediation Activities	VPM-04	Mechanisms exist to address new threats and vulnerabilities on an ongoing basis and ensure assets are protected against known attacks.	5	
CC4.2-POF1	Assesses Results	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Non-Compliance Oversight	CPL-01.1	Mechanisms exist to document and review instances of non-compliance with statutory, regulatory and/or contractual obligations to develop appropriate risk mitigation actions.	5	
		Functional	intersects with	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	5	
		Functional	intersects with	Assess Controls	GOV-15.3	Mechanisms exist to compel data and/or process owners to assess if required cybersecurity & data privacy controls for each system, application and/or service under their control are implemented correctly and are operating as intended.	5	
CC4.2-POF2	Communicates Deficiencies	Functional	intersects with	Steering Committee & Program Oversight	GOV-01.1	Mechanisms exist to coordinate cybersecurity, data protection and business alignment through a steering committee or advisory board, comprised of key cybersecurity, data privacy and business executives, which meets formally and on a regular basis.	5	
		Functional	intersects with	Status Reporting To Governing Body	GOV-01.2	Mechanisms exist to provide governance oversight reporting and recommendations to those entrusted to make executive decisions about matters considered material to the organization's cybersecurity & data protection program.	5	
		Functional	intersects with	Non-Compliance Oversight	CPL-01.1	Mechanisms exist to document and review instances of non-compliance with statutory, regulatory and/or contractual obligations to develop appropriate risk mitigation actions.	5	
		Functional	intersects with	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	5	
CC4.2-POF3	Monitors Corrective Action	Functional	intersects with	Non-Compliance Oversight	CPL-01.1	Mechanisms exist to document and review instances of non-compliance with statutory, regulatory and/or contractual obligations to develop appropriate risk mitigation actions.	5	
		Functional	intersects with	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity & data protection controls oversight function that reports to the organization's executive leadership.	5	
		Functional	intersects with	Plan of Action & Milestones (POA&M)	IAO-05	Mechanisms exist to generate a Plan of Action and Milestones (POA&M), or similar risk register, to document planned remedial actions to correct weaknesses or deficiencies noted during the assessment of the security controls and to reduce or eliminate known vulnerabilities.	5	
		Functional	intersects with	Risk Register	RSK-04.1	Mechanisms exist to maintain a risk register that facilitates monitoring and reporting of risks.	5	
CC5.1	COSO Principle 10	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		Functional	intersects with	Select Controls	GOV-15.1	Mechanisms exist to compel data and/or process owners to select required cybersecurity & data privacy controls for each system, application and/or service under their control.	5	
		Functional	intersects with	Implement Controls	GOV-15.2	Mechanisms exist to compel data and/or process owners to implement required cybersecurity & data privacy controls for each system, application and/or service under their control.	5	
		Functional	intersects with	Separation of Duties (SoD)	HRS-11	Mechanisms exist to implement and maintain Separation of Duties (SoD) to prevent potential inappropriate activity without collusion.	5	
		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	
		Functional	intersects with	Security Concept Of Operations (CONOPS)	OPS-02	Mechanisms exist to develop a security Concept of Operations (CONOPS), or a similarly-defined plan for achieving cybersecurity objectives, that documents management, operational and technical measures implemented to apply defense-in-depth techniques that is communicated to all appropriate stakeholders.	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
		Functional	intersects with	Centralized Management of Cybersecurity & Data Privacy Controls	SEA-01.1	Mechanisms exist to centrally-manage the organization-wide management and implementation of cybersecurity & data privacy controls and related processes.	5	
		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 & data privacy principles that addresses risk to organizational operations, assets, individuals, other organizations.	5	
CC5.1-POF1	Integrates With Risk Assessment	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
CC5.1-POF2	Considers Entity-Specific Factors	Functional	intersects with	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the mission of the organization.	5	
		Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
CC5.1-POF3	Determines Relevant Business Processes	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
CC5.1-POF4	Evaluates a Mix of Control Activity Types	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
CC5.1-POF5	Considers at What Level Activities Are Applied	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		Functional	intersects with	Targeted Capability Maturity Levels	PRM-01.2	Mechanisms exist to define and identify targeted capability maturity levels.	5	
CC5.1-POF6	Addresses Segregation of Duties	Functional	intersects with	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity & data privacy practices for each system, application and/or service under their control.	5	
		Functional	intersects with	Separation of Duties (SoD)	HRS-11	Mechanisms exist to implement and maintain Separation of Duties (SoD) to prevent potential inappropriate activity without collusion.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC5.2	COSO Principle 11	Functional	intersects with	Cybersecurity & Data Privacy Portfolio Management	PRM-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy-related resource planning controls that define a viable plan for achieving cybersecurity & data privacy objectives.	5	
		Functional	intersects with	Cybersecurity & Data Privacy In Project Management	PRM-04	Mechanisms exist to assess cybersecurity & data privacy controls in system project development to determine the extent to which the controls are implemented correctly, operating as intended and producing the desired outcome with respect to meeting the requirements.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Requirements Definition	PRM-05	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical systems, system components or services at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Development Life Cycle (SDLC) Management	PRM-07	Mechanisms exist to ensure changes to systems within the Secure Development Life Cycle (SDLC) are controlled through formal change control procedures.	5	
		Functional	intersects with	Business Impact Analysis (BIA)	RSK-08	Mechanisms exist to conduct a Business Impact Analysis (BIA) to identify and assess cybersecurity and data protection risks.	5	
		Functional	intersects with	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on systems, applications and services that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
		Functional	intersects with	Technology Development & Acquisition	TDA-01	Mechanisms exist to facilitate the implementation of tailored development and acquisition strategies, contract tools and procurement methods to meet unique business needs.	5	
		Functional	intersects with	Minimum Viable Product (MVP) Security Requirements	TDA-02	Mechanisms exist to ensure risk-based technical and functional specifications are established to define a Minimum Viable Product (MVP).	5	
CC5.2-POF1	Determines Dependency Between the Use of Technology in Business Processes and Technology General Controls	Functional	equal	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.	10	
CC5.2-POF2	Establishes Relevant Technology Infrastructure Control Activities	Functional	intersects with	Control Applicability Boundary Graphical Representation	AST-04.2	Mechanisms exist to ensure control applicability is appropriately-determined for systems, applications, services and third parties by graphically representing applicable boundaries.	5	
		Functional	intersects with	Compliance Scope	CPL-01.2	Mechanisms exist to document and validate the scope of cybersecurity & data privacy controls that are determined to meet statutory, regulatory and/or contractual compliance obligations.	5	
CC5.2-POF3	Establishes Relevant Security Management Process Controls Activities	Functional	intersects with	Least Functionality	CFG-03	Mechanisms exist to configure systems to provide only essential capabilities by specifically prohibiting or restricting the use of ports, protocols, and/or services.	5	
		Functional	intersects with	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce a Role-Based Access Control (RBAC) policy over users and resources that applies need-to-know and fine-grained access control for sensitive/regulated data access.	5	
		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	
CC5.2-POF4	Establishes Relevant Technology Acquisition, Development, and Maintenance Process Control Activities	Functional	equal	Technology Development & Acquisition	TDA-01	Mechanisms exist to facilitate the implementation of tailored development and acquisition strategies, contract tools and procurement methods to meet unique business needs.	10	
CC5.3	COSO Principle 12	Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		Functional	intersects with	Periodic Review & Update of Cybersecurity & Data Protection Program	GOV-03	Mechanisms exist to review the cybersecurity & data privacy program, including policies, standards and procedures, at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	5	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
		Functional	intersects with	Third-Party Personnel Security	HRS-10	Mechanisms exist to govern third-party personnel by reviewing and monitoring third-party cybersecurity & data privacy roles and responsibilities.	5	
		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	
CC5.3-POF1	Establishes Policies and Procedures to Support Deployment of Management's Directives	Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		Functional	intersects with	Business As Usual (BAU) Secure Practices	GOV-14	Mechanisms exist to incorporate cybersecurity & data privacy principles into Business As Usual (BAU) practices through executive leadership involvement.	5	
CC5.3-POF2	Establishes Responsibility and Accountability for Executing Policies and Procedures	Functional	intersects with	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 & data protection program.	5	
		Functional	intersects with	Stakeholder Accountability Structure	GOV-04.1	Mechanisms exist to enforce an accountability structure so that appropriate teams and individuals are empowered, responsible and trained for mapping, measuring and managing data and technology-related risks.	5	
		Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
CC5.3-POF3	Performs in a Timely Manner	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	
		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	
CC5.3-POF4	Takes Corrective Action	Functional	intersects with	Risk Remediation	RSK-06	Mechanisms exist to remediate risks to an acceptable level.	5	
		Functional	intersects with	Vulnerability Remediation Process	VPM-02	Mechanisms exist to ensure that vulnerabilities are properly identified, tracked and remediated.	5	
CC5.3-POF5	Performs Using Competent Personnel	Functional	intersects with	AI & Autonomous Technologies Stakeholder Competencies	AAT-13.1	Mechanisms exist to ensure Artificial Intelligence (AI) and Autonomous Technologies (AAT)-related operator and practitioner proficiency requirements for Artificial Intelligence (AI) and Autonomous Technologies (AAT) are defined, assessed and documented.	5	
		Functional	intersects with	Competency Requirements for Security-Related Positions	HRS-03.2	Mechanisms exist to ensure that all security-related positions are staffed by qualified individuals who have the necessary skill set.	5	
CC5.3-POF6	Reassesses Policies and Procedures	Functional	equal	Periodic Review & Update of Cybersecurity & Data Protection Program	GOV-03	Mechanisms exist to review the cybersecurity & data privacy program, including policies, standards and procedures, at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	10	
		Functional	intersects with	Measures of Performance	GOV-05	Mechanisms exist to develop, report and monitor cybersecurity & data privacy program measures of performance.	5	
		Functional	intersects with	Use of Cryptographic Controls	CRY-01	Mechanisms exist to facilitate the implementation of cryptographic protections controls using known public standards and trusted cryptographic technologies.	5	
		Functional	intersects with	Transmission Confidentiality	CRY-03	Cryptographic mechanisms exist to protect the confidentiality of data being transmitted.	5	
		Functional	intersects with	Encrypting Data At Rest	CRY-05	Cryptographic mechanisms exist to prevent unauthorized disclosure of data at rest.	5	
		Functional	intersects with	Public Key Infrastructure (PKI)	CRY-08	Mechanisms exist to securely implement an internal Public Key Infrastructure (PKI) infrastructure or obtain PKI services from a reputable PKI service provider.	5	
		Functional	intersects with	Cryptographic Key Management	CRY-09	Mechanisms exist to facilitate cryptographic key management controls to protect the confidentiality, integrity and availability of keys.	5	
		Functional	intersects with	Symmetric Keys	CRY-09.1	Mechanisms exist to facilitate the production and management of symmetric cryptographic keys using Federal Information Processing Standards (FIPS)-compliant key management technology and processes.	5	
		Functional	intersects with	Asymmetric Keys	CRY-09.2	Mechanisms exist to facilitate the production and management of asymmetric cryptographic keys using Federal Information Processing Standards (FIPS)-compliant key management technology and processes that protect the user's private key.	5	
		Functional	intersects with	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	5	
		Functional	intersects with	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.	5	
		Functional	intersects with	Identification & Authentication for Non-Organizational Users	IAC-03	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) third-party users and processes that provide services to the organization.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC6.1	The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives.	Functional	intersects with	Identification & Authentication for Devices	IAC-04	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) devices before establishing a connection using bidirectional authentication that is cryptographically- based and replay resistant.	5	
		Functional	intersects with	Identification & Authentication for Third Party Systems & Services	IAC-05	Mechanisms exist to identify and authenticate third-party systems and services.	5	
		Functional	intersects with	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce a Role-Based Access Control (RBAC) policy over users and resources that applies need-to-know and fine-grained access control for sensitive/regulated data access.	5	
		Functional	intersects with	Identifier Management (User Names)	IAC-09	Mechanisms exist to govern naming standards for usernames and systems.	5	
		Functional	intersects with	User Identity (ID) Management	IAC-09.1	Mechanisms exist to ensure proper user identification management for non-consumer users and administrators.	5	
		Functional	intersects with	Authenticator Management	IAC-10	Mechanisms exist to securely manage authenticators for users and devices.	5	
		Functional	intersects with	Vendor-Supplied Defaults	IAC-10.8	Mechanisms exist to ensure vendor-supplied defaults are changed as part of the installation process.	5	
		Functional	intersects with	Account Management	IAC-15	Mechanisms exist to proactively govern account management of individual, group, system, service, application, guest and temporary accounts.	5	
		Functional	intersects with	Privileged Account Management (PAM)	IAC-16	Mechanisms exist to restrict and control privileged access rights for users and services.	5	
		Functional	intersects with	Access Enforcement	IAC-20	Mechanisms exist to enforce Logical Access Control (LAC) permissions that conform to the principle of "least privilege."	5	
		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	
		Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Limit Network Connections	NET-03.1	Mechanisms exist to limit the number of concurrent external network connections to its systems.	5	
		Functional	intersects with	Data Flow Enforcement – Access Control Lists (ACLs)	NET-04	Mechanisms exist to design, implement and review firewall and router configurations to restrict connections between untrusted networks and internal systems.	5	
		Functional	intersects with	External System Connections	NET-05.1	Mechanisms exist to prohibit the direct connection of a sensitive system to an external network without the use of an organization-defined boundary protection device.	5	
		Functional	intersects with	Network Segmentation	NET-06	Mechanisms exist to ensure network architecture utilizes network segmentation to isolate systems, applications and services that protections from other network resources.	5	
		Functional	intersects with	Security Management Subnets	NET-06.1	Mechanisms exist to implement security management subnets to isolate security tools and support components from other internal system components by implementing separate subnetworks with managed interfaces to other components of the system.	5	
CC6.1-POF1	Identifies and Manages the Inventory of Information Assets	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	
		Functional	intersects with	Asset Inventories	AST-02	Mechanisms exist to perform inventories of technology assets that: • Accurately reflects the current systems, applications and services in use; • Identifies authorized software products, including business justification details; • Is at the level of granularity deemed necessary for tracking and reporting; • Includes organization-defined information deemed necessary to achieve effective property accountability; and • Is available for review and audit by designated organizational personnel.	5	
		Functional	intersects with	Asset Scope Classification	AST-04.1	Mechanisms exist to determine cybersecurity & data privacy control applicability by identifying, assigning and documenting the appropriate asset scope categorization for all systems, applications, services and personnel (internal and third-parties).	5	
		Functional	intersects with	Data & Asset Classification	DCH-02	Mechanisms exist to ensure data and assets are categorized in accordance with applicable statutory, regulatory and contractual requirements.	5	
CC6.1-POF2	Assesses New Architectures	Functional	subset of	Information Assurance (IA) Operations	IAO-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy assessment and authorization controls.	10	
		Functional	intersects with	Assessments	IAO-02	Mechanisms exist to formally assess the cybersecurity & data privacy controls in systems, applications and services 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.	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
		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 & data privacy principles that addresses risk to organizational operations, assets, individuals, other organizations.	5	
CC6.1-POF3	Restricts Logical Access	Functional	subset of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
		Functional	intersects with	Authenticate, Authorize and Audit (AAA)	IAC-01.2	Mechanisms exist to strictly govern the use of Authenticate, Authorize and Audit (AAA) solutions, both on-premises and those hosted by an External Service Provider (ESP).	5	
		Functional	intersects with	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.	5	
		Functional	intersects with	Identification & Authentication for Non-Organizational Users	IAC-03	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) third-party users and processes that provide services to the organization.	5	
		Functional	intersects with	Identification & Authentication for Devices	IAC-04	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) devices before establishing a connection using bidirectional authentication that is cryptographically- based and replay resistant.	5	
CC6.1-POF4	Identifies and Authenticates Users	Functional	intersects with	Authenticate, Authorize and Audit (AAA)	IAC-01.2	Mechanisms exist to strictly govern the use of Authenticate, Authorize and Audit (AAA) solutions, both on-premises and those hosted by an External Service Provider (ESP).	5	
		Functional	intersects with	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.	5	
		Functional	intersects with	Identification & Authentication for Non-Organizational Users	IAC-03	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) third-party users and processes that provide services to the organization.	5	
CC6.1-POF5	Considers Network Segmentation	Functional	intersects with	Cloud Services	CLD-01	Mechanisms exist to facilitate the implementation of cloud management controls to ensure cloud instances are secure and in-line with industry practices.	5	
		Functional	intersects with	Cloud Access Point (CAP)	CLD-11	Mechanisms exist to utilize Cloud Access Points (CAPs) to provide boundary protection and monitoring functions that both provide access to the cloud and protect the organization from the cloud.	5	
		Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Zero Trust Architecture (ZTA)	NET-01.1	Mechanisms exist to treat all users and devices as potential threats and prevent access to data and resources until the users can be properly authenticated and their access authorized.	5	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Managed Access Control Points	NET-14.3	Mechanisms exist to route all remote accesses through managed network access control points (e.g., VPN concentrator).	5	
CC6.1-POF6	Manages Points of Access	Functional	intersects with	Data Flow Enforcement – Access Control Lists (ACLs)	NET-04	Mechanisms exist to design, implement and review firewall and router configurations to restrict connections between untrusted networks and internal systems.	5	
		Functional	intersects with	Managed Access Control Points	NET-14.3	Mechanisms exist to route all remote accesses through managed network access control points (e.g., VPN concentrator).	5	
CC6.1-POF7	Restricts Access to Information Assets	Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
		Functional	intersects with	Least Functionality	CFG-03	Mechanisms exist to configure systems to provide only essential capabilities by specifically prohibiting or restricting the use of ports, protocols, and/or services.	5	
		Functional	intersects with	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	5	
		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	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC6.1-POF8	Manages Identification and Authentication	Functional	subset of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
		Functional	intersects with	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.	5	
		Functional	intersects with	Identification & Authentication for Devices	IAC-04	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) devices before establishing a connection using bidirectional authentication that is cryptographically- based and replay resistant.	5	
		Functional	intersects with	Identification & Authentication for Third Party Systems & Services	IAC-05	Mechanisms exist to identify and authenticate third-party systems and services.	5	
CC6.1-POF9	Manages Credentials for Infrastructure and Software	Functional	intersects with	Asset Governance	AST-01	Mechanisms exist to facilitate an IT Asset Management (ITAM) program to implement and manage asset management controls.	5	
		Functional	intersects with	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	5	
		Functional	intersects with	Information Assurance (IA) Operations	IAO-01	Mechanisms exist to facilitate the implementation of cybersecurity & data privacy assessment and authorization controls.	5	
		Functional	intersects with	Security Authorization	IAO-07	Mechanisms exist to ensure systems, projects and services are officially authorized prior to "go live" in a production environment.	5	
CC6.1-POF10	Uses Encryption to Protect Data	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	
		Functional	intersects with	Transmission Confidentiality	CRY-03	Cryptographic mechanisms exist to protect the confidentiality of data being transmitted.	5	
		Functional	intersects with	Transmission Integrity	CRY-04	Cryptographic mechanisms exist to protect the integrity of data being transmitted.	5	
		Functional	intersects with	Encrypting Data At Rest	CRY-05	Cryptographic mechanisms exist to prevent unauthorized disclosure of data at rest.	5	
		Functional	intersects with	Public Key Infrastructure (PKI)	CRY-08	Mechanisms exist to securely implement an internal Public Key Infrastructure (PKI) infrastructure or obtain PKI services from a reputable PKI service provider.	5	
		Functional	intersects with	Cryptographic Key Management	CRY-09	Mechanisms exist to facilitate cryptographic key management controls to protect the confidentiality, integrity and availability of keys.	5	
		Functional	intersects with	Symmetric Keys	CRY-09.1	Mechanisms exist to facilitate the production and management of symmetric cryptographic keys using Federal Information Processing Standards (FIPS)-compliant key management technology and processes.	5	
		Functional	intersects with	Asymmetric Keys	CRY-09.2	Mechanisms exist to facilitate the production and management of asymmetric cryptographic keys using Federal Information Processing Standards (FIPS)-compliant key management technology and processes that protect the user's private key.	5	
CC6.1-POF11	Protects Cryptographic Keys	Functional	intersects with	Use of Cryptographic Controls	CRY-01	Mechanisms exist to facilitate the implementation of cryptographic protections controls using known public standards and trusted cryptographic technologies.	5	
		Functional	intersects with	Public Key Infrastructure (PKI)	CRY-08	Mechanisms exist to securely implement an internal Public Key Infrastructure (PKI) infrastructure or obtain PKI services from a reputable PKI service provider.	5	
		Functional	subset of	Cryptographic Key Management	CRY-09	Mechanisms exist to facilitate cryptographic key management controls to protect the confidentiality, integrity and availability of keys.	10	
		Functional	intersects with	Symmetric Keys	CRY-09.1	Mechanisms exist to facilitate the production and management of symmetric cryptographic keys using Federal Information Processing Standards (FIPS)-compliant key management technology and processes.	5	
		Functional	intersects with	Asymmetric Keys	CRY-09.2	Mechanisms exist to facilitate the production and management of asymmetric cryptographic keys using Federal Information Processing Standards (FIPS)-compliant key management technology and processes that protect the user's private key.	5	
		Functional	intersects with	Cryptographic Key Loss or Change	CRY-09.3	Mechanisms exist to ensure the availability of information in the event of the loss of cryptographic keys by individual users.	5	
		Functional	intersects with	Control & Distribution of Cryptographic Keys	CRY-09.4	Mechanisms exist to facilitate the secure distribution of symmetric and asymmetric cryptographic keys using industry recognized key management technology and processes.	5	
CC6.1-POF12	Restricts Access to and Use of Confidential Information for Identified Purposes	Functional	intersects with	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce a Role-Based Access Control (RBAC) policy over users and resources that applies need-to-know and fine-grained access control for sensitive/regulated data access.	5	
		Functional	intersects with	Access To Sensitive / Regulated Data	IAC-20.1	Mechanisms exist to limit access to sensitive/regulated data to only those individuals whose job requires such access.	5	
		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	
CC6.1-POF13	Restricts Access to and the Use of Personal Information	Functional	intersects with	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce a Role-Based Access Control (RBAC) policy over users and resources that applies need-to-know and fine-grained access control for sensitive/regulated data access.	5	
		Functional	intersects with	Access To Sensitive / Regulated Data	IAC-20.1	Mechanisms exist to limit access to sensitive/regulated data to only those individuals whose job requires such access.	5	
		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	
		Functional	intersects with	Security of Personal Data	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
		Functional	intersects with	Internal Use of Personal Data For Testing, Training and Research	PRI-05.1	Mechanisms exist to address the use of Personal Data (PD) for internal testing, training and research that: • Takes measures to limit or minimize the amount of PD used for internal testing, training and research purposes; and • Authorizes the use of PD when such information is required for internal testing, training and research.	5	
CC6.2	Prior to issuing system credentials and granting system access, the entity registers and authorizes new internal and external users whose access is administered by the entity. For those users whose access is administered by the entity, user system credentials are removed when user access is no longer authorized.	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	
		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.	5	
		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	
CC6.2-POF1	Creates Access Credentials to Protected Information Assets	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	
		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.	5	
		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	
CC6.2-POF2	Reviews Validity of Access Credentials	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.	5	
		Functional	intersects with	Disable Inactive Accounts	IAC-15.3	Automated mechanisms exist to disable inactive accounts after an organization-defined time period.	5	
		Functional	intersects with	System Account Reviews	IAC-15.7	Mechanisms exist to review all system accounts and disable any account that cannot be associated with a business process and owner.	5	
		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	
CC6.2-POF3	Prevents the Use of Credentials When No Longer Valid	Functional	intersects with	Personnel Transfer	HRS-08	Mechanisms exist to adjust logical and physical access authorizations to systems and facilities upon personnel reassignment or transfer, in a timely manner.	5	
		Functional	intersects with	Personnel Termination	HRS-09	Mechanisms exist to govern the termination of individual employment.	5	
		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	
		Functional	intersects with	System Account Reviews	IAC-15.7	Mechanisms exist to review all system accounts and disable any account that cannot be associated with a business process and owner.	5	
		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	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC6.3	The entity authorizes, modifies, or removes access to data, software, functions, and other protected information assets based on roles, responsibilities, or the system design and changes, giving consideration to the concepts of least privilege and segregation of duties, to meet the entity's objectives.	Functional	equal	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce a Role-Based Access Control (RBAC) policy over users and resources that applies need-to-know and fine-grained access control for sensitive/regulated data access.	10	
CC6.3-POF1	Creates or Modifies Access to Protected Information Assets	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	
		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.	5	
		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	
CC6.3-POF2	Removes Access to Protected Information Assets	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	
		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.	5	
CC6.3-POF3	Uses Access Control Structures	Functional	equal	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce a Role-Based Access Control (RBAC) policy over users and resources that applies need-to-know and fine-grained access control for sensitive/regulated data access.	10	
CC6.3-POF4	Reviews Access Roles and Rules	Functional	equal	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.	10	
CC6.4	The entity restricts physical access to facilities and protected information assets (for example, data center facilities, backup media storage, and other sensitive locations) to authorized personnel to meet the entity's objectives.	Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
		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	
		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	
		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	
CC6.4-POF1	Creates or Modifies Physical Access	Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
		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	
		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	
		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	
CC6.4-POF2	Removes Physical Access	Functional	intersects with	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	5	
		Functional	intersects with	Visitor Access Revocation	PES-06.6	Mechanisms exist to ensure visitor badges, or other issued identification, are surrendered before visitors leave the facility or are deactivated at a pre-determined time/date of expiration.	5	
		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	
		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	
		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	
CC6.4-POF3	Recovers Physical Devices	Functional	intersects with	Return of Assets	AST-10	Mechanisms exist to ensure that employees and third-party users return all organizational assets in their possession upon termination of employment, contract or agreement.	5	
		Functional	intersects with	Asset Collection	HRS-09.1	Mechanisms exist to retrieve organization-owned assets upon termination of an individual's employment.	5	
CC6.4-POF4	Reviews Physical Access	Functional	intersects with	Physical Access Logs	PES-03.3	Physical access control mechanisms exist to generate a log entry for each access through controlled ingress and egress points.	5	
		Functional	equal	Monitoring Physical Access	PES-05	Physical access control mechanisms exist to monitor for, detect and respond to physical security incidents.	10	
CC6.5	The entity discontinues logical and physical protections over physical assets only after the ability to read or recover data and software from those assets has been diminished and is no longer required to meet the entity's objectives.	Functional	subset of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
		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	
		Functional	intersects with	Physical Media Disposal	DCH-08	Mechanisms exist to securely dispose of media when it is no longer required, using formal procedures.	5	
		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	
		Functional	intersects with	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	5	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
CC6.5-POF1	Removed from TSC 2017	N/A	N/A	N/A	N/A	N/A	5	Removed from TSC 2017
CC6.5-POF2	Removes Data and Software for Disposal	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	
		Functional	intersects with	Physical Media Disposal	DCH-08	Mechanisms exist to securely dispose of media when it is no longer required, using formal procedures.	5	
		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	
		Functional	intersects with	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	5	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
CC6.6	The entity implements logical access security measures to protect against threats from sources outside its system boundaries.	Functional	intersects with	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	5	
		Functional	intersects with	Authenticate, Authorize and Audit (AAA)	IAC-01.2	Mechanisms exist to strictly govern the use of Authenticate, Authorize and Audit (AAA) solutions, both on-premises and those hosted by an External Service Provider (ESP).	5	
		Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Layered Network Defenses	NET-02	Mechanisms exist to implement security functions as a layered structure that minimizes interactions between layers of the design and avoids any dependence by lower layers on the functionality or correctness of higher layers.	5	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Limit Network Connections	NET-03.1	Mechanisms exist to limit the number of concurrent external network connections to its systems.	5	
		Functional	intersects with	Data Flow Enforcement – Access Control Lists (ACLs)	NET-04	Mechanisms exist to design, implement and review firewall and router configurations to restrict connections between untrusted networks and internal systems.	5	
		Functional	intersects with	Deny Traffic by Default & Allow Traffic by Exception	NET-04.1	Mechanisms exist to configure firewall and router configurations to deny network traffic by default and allow network traffic by exception (e.g., deny all, permit by exception).	5	
		Functional	intersects with	DMZ Networks	NET-08.1	Mechanisms exist to monitor De-Militarized Zone (DMZ) network segments to separate untrusted networks from trusted networks.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Safeguarding Data Over Open Networks	NET-12	Cryptographic mechanisms exist to implement strong cryptography and security protocols to safeguard sensitive/regulated data during transmission over open, public networks.	5	
		Functional	intersects with	Wireless Link Protection	NET-12.1	Mechanisms exist to protect external and internal wireless links from signal parameter attacks through monitoring for unauthorized wireless connections, including scanning for unauthorized wireless access points and taking appropriate action, if an unauthorized connection is discovered.	5	
		Functional	intersects with	Electronic Messaging	NET-13	Mechanisms exist to protect the confidentiality, integrity and availability of electronic messaging communications.	5	
		Functional	intersects with	Remote Access	NET-14	Mechanisms exist to define, control and review organization-approved, secure remote access methods.	5	
CC6.6-POF1	Restricts Access	Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Data Flow Enforcement – Access Control Lists (ACLs)	NET-04	Mechanisms exist to design, implement and review firewall and router configurations to restrict connections between untrusted networks and internal systems.	5	
		Functional	intersects with	Deny Traffic by Default & Allow Traffic by Exception	NET-04.1	Mechanisms exist to configure firewall and router configurations to deny network traffic by default and allow network traffic by exception (e.g., deny all, permit by exception).	5	
CC6.6-POF2	Protects Identification and Authentication Credentials	Functional	intersects with	Use of Cryptographic Controls	CRY-01	Mechanisms exist to facilitate the implementation of cryptographic protections controls using known public standards and trusted cryptographic technologies.	5	
		Functional	intersects with	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	5	
		Functional	intersects with	Authenticate, Authorize and Audit (AAA)	IAC-01.2	Mechanisms exist to strictly govern the use of Authenticate, Authorize and Audit (AAA) solutions, both on-premises and those hosted by an External Service Provider (ESP).	5	
		Functional	intersects with	Password-Based Authentication	IAC-10.1	Mechanisms exist to enforce complexity, length and lifespan considerations to ensure strong criteria for password-based authentication.	5	
		Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Safeguarding Data Over Open Networks	NET-12	Cryptographic mechanisms exist to implement strong cryptography and security protocols to safeguard sensitive/regulated data during transmission over open, public networks.	5	
		Functional	intersects with	Electronic Messaging	NET-13	Mechanisms exist to protect the confidentiality, integrity and availability of electronic messaging communications.	5	
CC6.6-POF3	Requires Additional Authentication or Credentials	Functional	intersects with	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	5	
		Functional	intersects with	Authenticate, Authorize and Audit (AAA)	IAC-01.2	Mechanisms exist to strictly govern the use of Authenticate, Authorize and Audit (AAA) solutions, both on-premises and those hosted by an External Service Provider (ESP).	5	
		Functional	intersects with	Multi-Factor Authentication (MFA)	IAC-06	Automated mechanisms exist to enforce Multi-Factor Authentication (MFA) for: • Remote network access; • Third-party systems, applications and/or services; and/ or • Non-console access to critical systems or systems that store, transmit and/or process sensitive/regulated data.	5	
		Functional	intersects with	Adaptive Identification & Authentication	IAC-13	Mechanisms exist to allow individuals to utilize alternative methods of authentication under specific circumstances or situations.	5	
		Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Deny Traffic by Default & Allow Traffic by Exception	NET-04.1	Mechanisms exist to configure firewall and router configurations to deny network traffic by default and allow network traffic by exception (e.g., deny all, permit by exception).	5	
		Functional	intersects with	Remote Access	NET-14	Mechanisms exist to define, control and review organization-approved, secure remote access methods.	5	
CC6.6-POF4	Implements Boundary Protection Systems	Functional	intersects with	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	5	
		Functional	intersects with	Layered Network Defenses	NET-02	Mechanisms exist to implement security functions as a layered structure that minimizes interactions between layers of the design and avoids any dependence by lower layers on the functionality or correctness of higher layers.	5	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Managed Access Control Points	NET-14.3	Mechanisms exist to route all remote accesses through managed network access control points (e.g., VPN concentrator).	5	
CC6.7	The entity restricts the transmission, movement, and removal of information to authorized internal and external users and processes, and protects it during transmission, movement, or removal to meet the entity's objectives.	Functional	intersects with	Unsupported Internet Browsers & Email Clients	CFG-04.2	Mechanisms exist to allow only approved Internet browsers and email clients to run on systems.	5	
		Functional	intersects with	Transmission Confidentiality	CRY-03	Cryptographic mechanisms exist to protect the confidentiality of data being transmitted.	5	
		Functional	intersects with	Encrypting Data At Rest	CRY-05	Cryptographic mechanisms exist to prevent unauthorized disclosure of data at rest.	5	
		Functional	subset of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
		Functional	intersects with	Media Use	DCH-10	Mechanisms exist to restrict the use of types of digital media on systems or system components.	5	
		Functional	intersects with	Removable Media Security	DCH-12	Mechanisms exist to restrict removable media in accordance with data handling and acceptable usage parameters.	5	
		Functional	intersects with	Use of External Information Systems	DCH-13	Mechanisms exist to govern how external parties, systems and services are used to securely store, process and transmit data.	5	
		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	
		Functional	intersects with	Information Sharing	DCH-14	Mechanisms exist to utilize a process to assist users in making information sharing decisions to ensure data is appropriately protected.	5	
		Functional	intersects with	Ad-Hoc Transfers	DCH-17	Mechanisms exist to secure ad-hoc exchanges of large digital files with internal or external parties.	5	
		Functional	intersects with	Centralized Management Of Mobile Devices	MDM-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of mobile device management controls.	5	
		Functional	intersects with	Full Device & Container-Based Encryption	MDM-03	Cryptographic mechanisms exist to protect the confidentiality and integrity of information on mobile devices through full-device or container encryption.	5	
		Functional	intersects with	Electronic Messaging	NET-13	Mechanisms exist to protect the confidentiality, integrity and availability of electronic messaging communications.	5	
CC6.7-POF1	Restricts the Ability to Perform Transmission	Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
		Functional	intersects with	Least Functionality	CFG-03	Mechanisms exist to configure systems to provide only essential capabilities by specifically prohibiting or restricting the use of ports, protocols, and/or services.	5	
		Functional	intersects with	Ad-Hoc Transfers	DCH-17	Mechanisms exist to secure ad-hoc exchanges of large digital files with internal or external parties.	5	
		Functional	intersects with	Prevent Unauthorized Exfiltration	NET-03.5	Automated mechanisms exist to prevent the unauthorized exfiltration of sensitive/regulated data across managed interfaces.	5	
		Functional	intersects with	Deny Traffic by Default & Allow Traffic by Exception	NET-04.1	Mechanisms exist to configure firewall and router configurations to deny network traffic by default and allow network traffic by exception (e.g., deny all, permit by exception).	5	
		Functional	intersects with	End-User Messaging Technologies	NET-12.2	Mechanisms exist to prohibit the transmission of unprotected sensitive/regulated data by end-user messaging technologies.	5	
		Functional	intersects with	Data Loss Prevention (DLP)	NET-17	Automated mechanisms exist to implement Data Loss Prevention (DLP) to protect sensitive information as it is stored, transmitted and processed.	5	
CC6.7-POF2	Uses Encryption Technologies or Secure Communication Channels to Protect Data	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	
		Functional	intersects with	Transmission Confidentiality	CRY-03	Cryptographic mechanisms exist to protect the confidentiality of data being transmitted.	5	
		Functional	intersects with	Encrypting Data At Rest	CRY-05	Cryptographic mechanisms exist to prevent unauthorized disclosure of data at rest.	5	
		Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		Functional	intersects with	Security of Assets & Media	AST-05	Mechanisms exist to maintain strict control over the internal or external distribution of any kind of sensitive/regulated media.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC6.7-POF3	Protects Removal Media	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	
		Functional	intersects with	Alternate Physical Protection	CRY-01.1	Cryptographic mechanisms exist to prevent unauthorized disclosure of information as an alternative to physical safeguards.	5	
		Functional	intersects with	Encrypting Data At Rest	CRY-05	Cryptographic mechanisms exist to prevent unauthorized disclosure of data at rest.	5	
		Functional	intersects with	Storage Media	CRY-05.1	Cryptographic mechanisms exist to protect the confidentiality and integrity of sensitive/regulated data residing on storage media.	5	
		Functional	equal	Removable Media Security	DCH-12	Mechanisms exist to restrict removable media in accordance with data handling and acceptable usage parameters.	10	
		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	
CC6.7-POF4	Protects Endpoint Devices	Functional	intersects with	Endpoint Security	END-01	Mechanisms exist to facilitate the implementation of endpoint security controls.	5	
		Functional	intersects with	Centralized Management Of Mobile Devices	MDM-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of mobile device management controls.	5	
CC6.8	The entity implements controls to prevent or detect and act upon the introduction of unauthorized	Functional	intersects with	Prohibition Of Changes	CHG-02.1	Mechanisms exist to prohibit unauthorized changes, unless organization-approved change requests are received.	5	
		Functional	intersects with	Malicious Code Protection (Anti-Malware)	END-04	Mechanisms exist to utilize antimalware technologies to detect and eradicate malicious code.	5	
		Functional	intersects with	Endpoint File Integrity Monitoring (FIM)	END-06	Mechanisms exist to utilize File Integrity Monitor (FIM) technology to detect and report unauthorized changes to system files and configurations.	5	
		Functional	intersects with	Host Intrusion Detection and Prevention Systems (HIDS / HIPS)	END-07	Mechanisms exist to utilize Host-based Intrusion Detection / Prevention Systems (HIDS / HIPS) on sensitive systems.	5	
		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	
		Functional	intersects with	Boundary Protection	NET-03	Mechanisms exist to monitor and control communications at the external network boundary and at key internal boundaries within the network.	5	
		Functional	intersects with	Network Intrusion Detection / Prevention Systems (NIDS / NIPS)	NET-08	Mechanisms exist to employ Network Intrusion Detection / Prevention Systems (NIDS/NIPS) to detect and/or prevent intrusions into the network.	5	
CC6.8-POF1	Restricts Installation and Modification of Application and Software	Functional	intersects with	User-Installed Software	CFG-05	Mechanisms exist to restrict the ability of non-privileged users to install unauthorized software.	5	
		Functional	intersects with	Restrict Roles Permitted To Install Software	CFG-05.2	Mechanisms exist to configure systems to prevent the installation of software, unless the action is performed by a privileged user or service.	5	
		Functional	intersects with	Prohibit Installation Without Privileged Status	END-03	Automated mechanisms exist to prohibit software installations without explicitly assigned privileged status.	5	
CC6.8-POF2	Detects Unauthorized Changes to Software and Configuration Parameters	Functional	intersects with	Unauthorized Installation Alerts	CFG-05.1	Mechanisms exist to configure systems to generate an alert when the unauthorized installation of software is detected.	5	
		Functional	intersects with	Software Installation Alerts	END-03.1	Mechanisms exist to generate an alert when new software is detected.	5	
CC6.8-POF3	Uses a Defined Change Control Process	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
CC6.8-POF4	Uses Antivirus and Anti-Malware Software	Functional	equal	Malicious Code Protection (Anti-Malware)	END-04	Mechanisms exist to utilize antimalware technologies to detect and eradicate malicious code.	10	
CC6.8-POF5	Scans Information Assets From Outside the Entity for Malware and Other Unauthorized Software	Functional	equal	Always On Protection	END-04.7	Mechanisms exist to ensure that anti-malware technologies are continuously running in real-time and cannot be disabled or altered by non-privileged users, unless specifically authorized by management on a case-by-case basis for a limited time period.	10	
CC7.1	To meet its objectives, the entity uses detection and monitoring procedures to identify (1) changes to configurations that result in the introduction of new vulnerabilities, and (2) susceptibilities to newly discovered vulnerabilities.	Functional	intersects with	Configuration Management Program	CFG-01	Mechanisms exist to facilitate the implementation of configuration management controls.	5	
		Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
		Functional	intersects with	Integrity Checks	END-06.1	Mechanisms exist to validate configurations through integrity checking of software and firmware.	5	
		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	
		Functional	intersects with	Vulnerability Scanning	VPM-06	Mechanisms exist to detect vulnerabilities and configuration errors by recurring vulnerability scanning of systems and web applications.	5	
CC7.1-POF1	Uses Defined Configuration Standards	Functional	intersects with	Configuration Management Program	CFG-01	Mechanisms exist to facilitate the implementation of configuration management controls.	5	
		Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
		Functional	intersects with	Automated Central Management & Verification	CFG-02.2	Automated mechanisms exist to govern and report on baseline configurations of systems through Continuous Diagnostics and Mitigation (CDM), or similar technologies.	5	
CC7.1-POF2	Monitors Infrastructure and Software	Functional	intersects with	Endpoint File Integrity Monitoring (FIM)	END-06	Mechanisms exist to utilize File Integrity Monitor (FIM) technology to detect and report unauthorized changes to system files and configurations.	5	
		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	
CC7.1-POF3	Implements Change-Detection Mechanisms	Functional	intersects with	Endpoint File Integrity Monitoring (FIM)	END-06	Mechanisms exist to utilize File Integrity Monitor (FIM) technology to detect and report unauthorized changes to system files and configurations.	5	
		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	
CC7.1-POF4	Detects Unknown or Unauthorized Components	Functional	intersects with	Automated Unauthorized Component Detection	AST-02.2	Automated mechanisms exist to detect and alert upon the detection of unauthorized hardware, software and firmware components.	5	
		Functional	intersects with	Endpoint File Integrity Monitoring (FIM)	END-06	Mechanisms exist to utilize File Integrity Monitor (FIM) technology to detect and report unauthorized changes to system files and configurations.	5	
		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	
CC7.1-POF5	Conducts Vulnerability Scans	Functional	equal	Vulnerability Scanning	VPM-06	Mechanisms exist to detect vulnerabilities and configuration errors by recurring vulnerability scanning of systems and web applications.	10	
CC7.2	The entity monitors system components and the operation of those components for anomalies that are indicative of malicious acts, natural disasters, and errors affecting the entity's ability to meet its objectives; anomalies are analyzed to determine whether they represent security events.	Functional	intersects with	Automated Central Management & Verification	CFG-02.2	Automated mechanisms exist to govern and report on baseline configurations of systems through Continuous Diagnostics and Mitigation (CDM), or similar technologies.	5	
		Functional	intersects with	Continuous Monitoring	MON-01	Mechanisms exist to facilitate the implementation of enterprise-wide monitoring controls.	5	
		Functional	intersects with	Intrusion Detection & Prevention Systems (IDS & IPS)	MON-01.1	Mechanisms exist to implement Intrusion Detection / Prevention Systems (IDS / IPS) technologies on critical systems, key network segments and network choke points.	5	
		Functional	intersects with	Automated Tools for Real-Time Analysis	MON-01.2	Mechanisms exist to utilize a Security Incident Event Manager (SIEM), or similar automated tool, to support near real-time analysis and incident escalation.	5	
		Functional	intersects with	Inbound & Outbound Communications Traffic	MON-01.3	Mechanisms exist to continuously monitor inbound and outbound communications traffic for unusual or unauthorized activities or conditions.	5	
		Functional	intersects with	System Generated Alerts	MON-01.4	Mechanisms exist to monitor, correlate and respond to alerts from physical, cybersecurity, data privacy and supply chain activities to achieve integrated situational awareness.	5	
		Functional	intersects with	Wireless Intrusion Detection System (WIDS)	MON-01.5	Mechanisms exist to utilize Wireless Intrusion Detection / Protection Systems (WIDS / WIPS) to identify rogue wireless devices and to detect attack attempts via wireless networks.	5	
		Functional	intersects with	Host-Based Devices	MON-01.6	Mechanisms exist to utilize Host-based Intrusion Detection / Prevention Systems (HIDS / HIPS) to actively alert on or block unwanted activities and send logs to a Security Incident Event Manager (SIEM), or similar automated tool, to maintain situational awareness.	5	
		Functional	intersects with	Reviews & Updates	MON-01.8	Mechanisms exist to review event logs on an ongoing basis and escalate incidents in accordance with established timelines and procedures.	5	
		Functional	intersects with	Centralized Collection of Security Event Logs	MON-02	Mechanisms exist to utilize a Security Incident Event Manager (SIEM) or similar automated tool, to support the centralized collection of security-related event logs.	5	
		Functional	intersects with	Correlate Monitoring Information	MON-02.1	Automated mechanisms exist to correlate both technical and non-technical information from across the enterprise by a Security Incident Event Manager (SIEM) or similar automated tool, to enhance organization-wide situational awareness.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Monitoring Reporting	MON-06	Mechanisms exist to provide an event log report generation capability to aid in detecting and assessing anomalous activities.	5	
		Functional	intersects with	Anomalous Behavior	MON-16	Mechanisms exist to detect and respond to anomalous behavior that could indicate account compromise or other malicious activities.	5	
		Functional	intersects with	Security Concept Of Operations (CONOPS)	OPS-02	Mechanisms exist to develop a security Concept of Operations (CONOPS), or a similarly-defined plan for achieving cybersecurity objectives, that documents management, operational and technical measures implemented to apply defense-in-depth techniques that is communicated to all appropriate stakeholders.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		Functional	intersects with	Continuous Monitoring	MON-01	Mechanisms exist to facilitate the implementation of enterprise-wide monitoring controls.	5	
CC7.2-POF1	Implements Detection Policies, Procedures, and Tools	Functional	intersects with	Automated Tools for Real-Time Analysis	MON-01.2	Mechanisms exist to utilize a Security Incident Event Manager (SIEM), or similar automated tool, to support near real-time analysis and incident escalation.	5	
		Functional	intersects with	Centralized Collection of Security Event Logs	MON-02	Mechanisms exist to utilize a Security Incident Event Manager (SIEM) or similar automated tool, to support the centralized collection of security-related event logs.	5	
		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	
		Functional	intersects with	Intrusion Detection & Prevention Systems (IDS & IPS)	MON-01.1	Mechanisms exist to implement Intrusion Detection / Prevention Systems (IDS / IPS) technologies on critical systems, key network segments and network choke points.	5	
		Functional	intersects with	System Generated Alerts	MON-01.4	Mechanisms exist to monitor, correlate and respond to alerts from physical, cybersecurity, data privacy and supply chain activities to achieve integrated situational awareness.	5	
CC7.2-POF2	Designs Detection Measures	Functional	intersects with	Automated Alerts	MON-01.12	Mechanisms exist to automatically alert incident response personnel to inappropriate or anomalous activities that have potential security incident implications.	5	
		Functional	intersects with	Anomalous Behavior	MON-16	Mechanisms exist to detect and respond to anomalous behavior that could indicate account compromise or other malicious activities.	5	
		Functional	intersects with	Intrusion Detection & Prevention Systems (IDS & IPS)	MON-01.1	Mechanisms exist to implement Intrusion Detection / Prevention Systems (IDS / IPS) technologies on critical systems, key network segments and network choke points.	5	
		Functional	intersects with	Automated Tools for Real-Time Analysis	MON-01.2	Mechanisms exist to utilize a Security Incident Event Manager (SIEM), or similar automated tool, to support near real-time analysis and incident escalation.	5	
CC7.2-POF3	Implements Filters to Analyze Anomalies	Functional	intersects with	Anomalous Behavior	MON-16	Mechanisms exist to detect and respond to anomalous behavior that could indicate account compromise or other malicious activities.	5	
		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 & data protection policies and standards.	5	
CC7.2-POF4	Monitors Detection Tools for Effective Operation	Functional	intersects with	Reviews & Updates	MON-01.8	Mechanisms exist to review event logs on an ongoing basis and escalate incidents in accordance with established timelines and procedures.	5	
		Functional	intersects with	Integration of Detection & Response	END-06.2	Mechanisms exist to detect and respond to unauthorized configuration changes as cybersecurity incidents.	5	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	5	
CC7.3	The entity evaluates security events to determine whether they could or have resulted in a failure of the entity to meet its objectives (security incidents) and, if so, takes actions to prevent or address such failures.	Functional	intersects with	Centralized Collection of Security Event Logs	MON-02	Mechanisms exist to utilize a Security Incident Event Manager (SIEM) or similar automated tool, to support the centralized collection of security-related event logs.	5	
		Functional	intersects with	Correlate Monitoring Information	MON-02.1	Automated mechanisms exist to correlate both technical and non-technical information from across the enterprise by a Security Incident Event Manager (SIEM) or similar automated tool, to enhance organization-wide situational awareness.	5	
		Functional	intersects with	Monitoring Reporting	MON-06	Mechanisms exist to provide an event log report generation capability to aid in detecting and assessing anomalous activities.	5	
		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 systems and data.	5	
		Functional	intersects with	Third-Party Incident Response & Recovery Capabilities	TPM-11	Mechanisms exist to ensure response/recovery planning and testing are conducted with critical suppliers/providers.	5	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
CC7.3-POF1	Responds to Security Incidents	Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity & data privacy incidents to internal stakeholders all the way through the resolution of the incident.	5	
CC7.3-POF2	Communicates and Reviews Detected Security Events	Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
CC7.3-POF3	Develops and Implements Procedures to Analyze Security Incidents	Functional	subset of	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	10	
CC7.3-POF4	Assesses the Impact on Confidential Information	Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	5	
CC7.3-POF5	Determines Confidential Information Used or Disclosed	Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	5	
CC7.3-POF6	Assesses the Impact on Personal Information	Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Risk Framing	RSK-01.1	Mechanisms exist to identify: • Assumptions affecting risk assessments, risk response and risk monitoring; • Constraints affecting risk assessments, risk response and risk monitoring; • The organizational risk tolerance; and • Priorities, benefits and trade-offs considered by the organization for managing risk.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC7.3-POF7	Determines Personal Information Used or Disclosed	Functional	intersects with	Incident Classification & Prioritization	IRO-02.4	Mechanisms exist to identify classes of incidents and actions to take to ensure the continuation of organizational missions and business functions.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
CC7.4	The entity responds to identified security incidents by executing a defined incident-response program to understand, contain, remediate, and communicate security incidents, as appropriate.	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Integrated Security Incident Response Team (ISIRT)	IRO-07	Mechanisms exist to establish an integrated team of cybersecurity, IT and business function representatives that are capable of addressing cybersecurity & data privacy incident response operations.	5	
		Functional	intersects with	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity & data privacy incidents to internal stakeholders all the way through the resolution of the incident.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
		Functional	intersects with	Supply Chain Coordination	IRO-10.4	Mechanisms exist to provide cybersecurity & data privacy incident information to the provider of the product or service and other organizations involved in the supply chain for systems or system components related to the incident.	5	
		Functional	intersects with	Coordination With External Providers	IRO-11.2	Mechanisms exist to establish a direct, cooperative relationship between the organization's incident response capability and external service providers.	5	
		Functional	intersects with	Regulatory & Law Enforcement Contacts	IRO-14	Mechanisms exist to maintain incident response contacts with applicable regulatory and law enforcement agencies.	5	
		Functional	intersects with	Risk Remediation	RSK-06	Mechanisms exist to remediate risks to an acceptable level.	5	
CC7.4-POF1	Assigns Roles and Responsibilities	Functional	intersects with	Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity responsibilities for all personnel.	5	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Integrated Security Incident Response Team (ISIRT)	IRO-07	Mechanisms exist to establish an integrated team of cybersecurity, IT and business function representatives that are capable of addressing cybersecurity & data privacy incident response operations.	5	
CC7.4-POF2	Contains and Responds to Security Incidents	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC7.4-POF3	Mitigates Ongoing Security Incidents	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC7.4-POF4	Resolves Security Incidents	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC7.4-POF5	Restores Operations	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC7.4-POF6	Develops and Implements Communication of Security Incidents	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity & data privacy incidents to internal stakeholders all the way through the resolution of the incident.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
CC7.4-POF7	Obtains Understanding of Nature of Incident and Determines Containment Strategy	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC7.4-POF8	Remediates Identified Vulnerabilities	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Risk Remediation	RSK-06	Mechanisms exist to remediate risks to an acceptable level.	5	
		Functional	intersects with	Vulnerability Remediation Process	VPM-02	Mechanisms exist to ensure that vulnerabilities are properly identified, tracked and remediated.	5	
CC7.4-POF9	Communicates Remediation Activities	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity & data privacy incidents to internal stakeholders all the way through the resolution of the incident.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC7.4-POF10	Evaluates the Effectiveness of Incident Response	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	
		Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Root Cause Analysis (RCA) & Lessons Learned	IRO-13	Mechanisms exist to incorporate lessons learned from analyzing and resolving cybersecurity & data privacy incidents to reduce the likelihood or impact of future incidents.	5	
CC7.4-POF11	Periodically Evaluates Incidents	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	IRP Update	IRO-04.2	Mechanisms exist to regularly review and modify incident response practices to incorporate lessons learned, business process changes and industry developments, as necessary.	5	
CC7.4-POF12	Applies Breach Response Procedures	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
CC7.4-POF13	Communicates Unauthorized Use and Disclosure	Functional	intersects with	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity & data privacy-related incidents.	5	
		Functional	intersects with	Incident Handling	IRO-02	Mechanisms exist to cover the preparation, automated detection or intake of incident reporting, analysis, containment, eradication and recovery.	5	
		Functional	intersects with	Incident Response Plan (IRP)	IRO-04	Mechanisms exist to maintain and make available a current and viable Incident Response Plan (IRP) to all stakeholders.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Cyber Incident Reporting for Sensitive Data	IRO-10.2	Mechanisms exist to report sensitive/regulated data incidents in a timely manner.	5	
CC7.4-POF14	Application of Sanctions	Functional	subset of	Personnel Sanctions	HRS-07	Mechanisms exist to sanction personnel failing to comply with established security policies, standards and procedures.	10	
CC7.5	The entity identifies, develops, and implements activities to recover from identified security incidents.	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Identify Critical Assets	BCD-02	Mechanisms exist to identify and document the critical systems, applications and services that support essential missions and business functions.	5	
		Functional	intersects with	Resume All Missions & Business Functions	BCD-02.1	Mechanisms exist to resume all missions and business functions within Recovery Time Objectives (RTOs) of the contingency plan's activation.	5	
		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	
		Functional	intersects with	Resume Essential Missions & Business Functions	BCD-02.3	Mechanisms exist to resume essential missions and business functions within an organization-defined time period of contingency plan activation.	5	
		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	
		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	
		Functional	intersects with	Contingency Planning & Updates	BCD-06	Mechanisms exist to keep contingency plans current with business needs, technology changes and feedback from contingency plan testing activities.	5	
		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 satisfying Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	5	
		Functional	intersects with	Testing for Reliability & Integrity	BCD-11.1	Mechanisms exist to routinely test backups that verify the reliability of the backup process, as well as the integrity and availability of the data.	5	
		Functional	intersects with	Information System Recovery & Reconstitution	BCD-12	Mechanisms exist to ensure the secure recovery and reconstitution of systems to a known state after a disruption, compromise or failure.	5	
		Functional	intersects with	Backup & Restoration Hardware Protection	BCD-13	Mechanisms exist to protect backup and restoration hardware and software.	5	
CC7.5-POF1	Restores the Affected Environment	Functional	subset of	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
		Functional	intersects with	Resume All Missions & Business Functions	BCD-02.1	Mechanisms exist to resume all missions and business functions within Recovery Time Objectives (RTOs) of the contingency plan's activation.	5	
		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	
		Functional	intersects with	Resume Essential Missions & Business Functions	BCD-02.3	Mechanisms exist to resume essential missions and business functions within an organization-defined time period of contingency plan activation.	5	
		Functional	intersects with	Information System Recovery & Reconstitution	BCD-12	Mechanisms exist to ensure the secure recovery and reconstitution of systems to a known state after a disruption, compromise or failure.	5	
CC7.5-POF2	Communicates Information About the Incident	Functional	equal	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
		Functional	intersects with	Recovery Operations Communications	BCD-01.6	Mechanisms exist to communicate the status of recovery activities and progress in restoring operational capabilities to designated internal and external stakeholders.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
CC7.5-POF3	Determines Root Cause of the Incident	Functional	equal	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.	10	
CC7.5-POF4	Implements Changes to Prevent and Detect Recurrences	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Contingency Planning & Updates	BCD-06	Mechanisms exist to keep contingency plans current with business needs, technology changes and feedback from contingency plan testing activities.	5	
CC7.5-POF5	Improves Response and Recovery Procedures	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Contingency Planning & Updates	BCD-06	Mechanisms exist to keep contingency plans current with business needs, technology changes and feedback from contingency plan testing activities.	5	
CC7.5-POF6	Implements Incident-Recovery Plan Testing	Functional	subset of	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.	10	
CC8.1	The entity authorizes, designs, develops or acquires, configures, documents, tests, approves, and implements changes to infrastructure, data, software, and procedures to meet its objectives.	Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
		Functional	intersects with	Reviews & Updates	CFG-02.1	Mechanisms exist to review and update baseline configurations: • At least annually; • When required due to so; or • As part of system component installations and upgrades.	5	
		Functional	intersects with	Automated Central Management & Verification	CFG-02.2	Automated mechanisms exist to govern and report on baseline configurations of systems through Continuous Diagnostics and Mitigation (CDM), or similar technologies.	5	
		Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
		Functional	intersects with	Stakeholder Notification of Changes	CHG-05	Mechanisms exist to ensure stakeholders are made aware of and understand the impact of proposed changes.	5	
		Functional	intersects with	Secure Development Life Cycle (SDLC) Management	PRM-07	Mechanisms exist to ensure changes to systems within the Secure Development Life Cycle (SDLC) are controlled through formal change control procedures.	5	
CC8.1-POF1	Manages Changes Throughout the System Life Cycle	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Secure Development Life Cycle (SDLC) Management	PRM-07	Mechanisms exist to ensure changes to systems within the Secure Development Life Cycle (SDLC) are controlled through formal change control procedures.	5	
CC8.1-POF2	Authorizes Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Prohibition Of Changes	CHG-02.1	Mechanisms exist to prohibit unauthorized changes, unless organization-approved change requests are received.	5	
		Functional	intersects with	Access Restriction For Change	CHG-04	Mechanisms exist to enforce configuration restrictions in an effort to restrict the ability of users to conduct unauthorized changes.	5	
CC8.1-POF3	Designs and Develops Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Cybersecurity & Data Privacy Representative for Asset Lifecycle Changes	CHG-02.3	Mechanisms exist to include a cybersecurity and/or data privacy representative in the configuration change control review process.	5	
		Functional	intersects with	Security Impact Analysis for Changes	CHG-03	Mechanisms exist to analyze proposed changes for potential security impacts, prior to the implementation of the change.	5	
CC8.1-POF4	Documents Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
CC8.1-POF5	Tracks System Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
CC8.1-POF6	Configures Software	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Configuration Management Program	CFG-01	Mechanisms exist to facilitate the implementation of configuration management controls.	5	
		Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
		Functional	intersects with	Automated Central Management & Verification	CFG-02.2	Automated mechanisms exist to govern and report on baseline configurations of systems through Continuous Diagnostics and Mitigation (CDM), or similar technologies.	5	
CC8.1-POF7	Tests System Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
CC8.1-POF8	Approves System Changes	Functional	subset of	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	10	
		Functional	subset of	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	10	
CC8.1-POF9	Deploys System Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Access Restriction For Change	CHG-04	Mechanisms exist to enforce configuration restrictions in an effort to restrict the ability of users to conduct unauthorized changes.	5	
		Functional	intersects with	Limit Production / Operational Privileges (Incompatible Roles)	CHG-04.4	Mechanisms exist to limit operational privileges for implementing changes.	5	
CC8.1-POF10	Identifies and Evaluates System Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
		Functional	intersects with	Security Impact Analysis for Changes	CHG-03	Mechanisms exist to analyze proposed changes for potential security impacts, prior to the implementation of the change.	5	
		Functional	intersects with	Automated Access Enforcement / Auditing	CHG-04.1	Mechanisms exist to perform after-the-fact reviews of configuration change logs to discover any unauthorized changes.	5	
CC8.1-POF11	Identifies Changes in Infrastructure, Data, Software, and Procedures Required to Remediate Incidents	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Automated Access Enforcement / Auditing	CHG-04.1	Mechanisms exist to perform after-the-fact reviews of configuration change logs to discover any unauthorized changes.	5	
		Functional	intersects with	Automated Central Management & Verification	CFG-02.2	Automated mechanisms exist to govern and report on baseline configurations of systems through Continuous Diagnostics and Mitigation (CDM), or similar technologies.	5	
CC8.1-POF12	Creates Baseline Configuration of IT Technology	Functional	intersects with	Configuration Management Program	CFG-01	Mechanisms exist to facilitate the implementation of configuration management controls.	5	
		Functional	intersects with	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for technology platforms that are consistent with industry-accepted system hardening standards.	5	
CC8.1-POF13	Provides for Changes Necessary in Emergency Situations	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
		Functional	intersects with	Emergency Accounts	IAC-15.9	Mechanisms exist to establish and control "emergency access only" accounts.	5	
CC8.1-POF14	Manages Patch Changes	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Configuration Change Control	CHG-02	Mechanisms exist to govern the technical configuration change control processes.	5	
		Functional	intersects with	Vulnerability & Patch Management Program (VPMP)	VPM-01	Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls.	5	
		Functional	intersects with	Software & Firmware Patching	VPM-05	Mechanisms exist to conduct software patching for all deployed operating systems, applications and firmware.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC8.1-POF15	Considers System Resilience	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
		Functional	intersects with	Achieving Resilience Requirements	SEA-01.2	Mechanisms exist to achieve resilience requirements in normal and adverse situations.	5	
CC8.1-POF16	Protects Confidential Information	Functional	intersects with	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	5	
		Functional	intersects with	Test, Validate & Document Changes	CHG-02.2	Mechanisms exist to appropriately test and document proposed changes in a non-production environment before changes are implemented in a production environment.	5	
		Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		Functional	intersects with	Vulnerability & Patch Management Program (VPMP)	VPM-01	Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls.	5	
		Functional	intersects with	Software & Firmware Patching	VPM-05	Mechanisms exist to conduct software patching for all deployed operating systems, applications and firmware.	5	
CC8.1-POF17	Protects Personal Information	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		Functional	intersects with	Sensitive / Regulated Data Protection	DCH-01.2	Mechanisms exist to protect sensitive/regulated data wherever it is stored.	5	
		Functional	intersects with	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data privacy controls.	5	
CC8.1-POF18	Privacy by Design	Functional	subset of	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data privacy controls.	10	
		Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	5	
		Functional	intersects with	Authority To Collect, Use, Maintain & Share Personal Data	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the collection, use, maintenance and sharing of Personal Data (PD), either generally or in support of a specific program or system need.	5	
		Functional	intersects with	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	5	
CC9.1	The entity identifies, selects, and develops risk mitigation activities for risks arising from potential business disruptions.	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Alternative Security Measures	BCD-07	Mechanisms exist to implement alternative or compensating controls to satisfy security functions when the primary means of implementing the security function is unavailable or compromised.	5	
		Functional	intersects with	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
		Functional	intersects with	Risk Identification	RSK-03	Mechanisms exist to identify and document risks, both internal and external.	5	
		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	
		Functional	intersects with	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	5	
		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	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Third-Party Criticality Assessments	TPM-02	Mechanisms exist to identify, prioritize and assess suppliers and partners of critical systems, components and services using a supply chain risk assessment process relative to their importance in supporting the delivery of high-value services.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Acquisition Strategies, Tools & Methods	TPM-03.1	Mechanisms exist to utilize tailored acquisition strategies, contract tools and procurement methods for the purchase of unique systems, system components or services.	5	
		Functional	intersects with	Limit Potential Harm	TPM-03.2	Mechanisms exist to utilize security safeguards to limit harm from potential adversaries who identify and target the organization's supply chain.	5	
		Functional	intersects with	Processes To Address Weaknesses or Deficiencies	TPM-03.3	Mechanisms exist to address identified weaknesses or deficiencies in the security of the supply chain	5	
		Functional	intersects with	Third-Party Processing, Storage and Service Locations	TPM-04.4	Mechanisms exist to restrict the location of information processing/storage based on business requirements.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	Third-Party Personnel Security	TPM-06	Mechanisms exist to control personnel security requirements including security roles and responsibilities for third-party providers.	5	
		Functional	intersects with	Monitoring for Third-Party Information Disclosure	TPM-07	Mechanisms exist to monitor for evidence of unauthorized exfiltration or disclosure of organizational information.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
		Functional	intersects with	Managing Changes To Third-Party Services	TPM-10	Mechanisms exist to control changes to services by suppliers, taking into account the criticality of business information, systems and processes that are in scope by the third-party.	5	
CC9.1-POF1	Considers Mitigation of Risks of Business Disruption	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Compensating Countermeasures	RSK-06.2	Mechanisms exist to identify and implement compensating countermeasures to reduce risk and exposure to threats.	5	
		Functional	intersects with	Business Impact Analysis (BIA)	RSK-08	Mechanisms exist to conduct a Business Impact Analysis (BIA) to identify and assess cybersecurity and data protection risks.	5	
CC9.1-POF2	Considers the Use of Insurance to Mitigate Financial Impact Risks	Functional	intersects with	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient assets and services (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	5	
		Functional	intersects with	Compensating Countermeasures	RSK-06.2	Mechanisms exist to identify and implement compensating countermeasures to reduce risk and exposure to threats.	5	
		Functional	intersects with	Business Impact Analysis (BIA)	RSK-08	Mechanisms exist to conduct a Business Impact Analysis (BIA) to identify and assess cybersecurity and data protection risks.	5	
CC9.2	The entity assesses and manages risks associated with vendors and business partners.	Functional	subset of	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	10	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	subset of	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	10	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
		Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC9.2-POF1	Establishes Requirements for Vendor and Business Partner Engagements	Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	subset of	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	10	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity & data privacy requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
CC9.2-POF2	Identifies Vulnerabilities	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
CC9.2-POF3	Assesses Vendor and Business Partner Risks	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
CC9.2-POF4	Assigns Responsibility and Accountability for Managing Vendors and Business Partners	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
CC9.2-POF5	Establishes Communication Protocols for Vendors and Business Partners	Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
CC9.2-POF6	Establishes Exception Handling Procedures From Vendors and Business Partners	Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
CC9.2-POF7	Assesses Vendor and Business Partner Performance	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Scope Review	TPM-05.5	Mechanisms exist to perform recurring validation of the Responsible, Accountable, Supportive, Consulted & Informed (RASCI) matrix, or similar documentation, to ensure cybersecurity & data privacy control assignments accurately reflect current business practices, compliance obligations, technologies and stakeholders.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
CC9.2-POF8	Implements Procedures for Addressing Issues Identified During Vendor and Business Partner Assessments	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
		Functional	intersects with	Break Clauses	TPM-05.7	Mechanisms exist to include "break clauses" within contracts for failure to meet contract criteria for cybersecurity and/or data privacy controls.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
		Functional	intersects with	Managing Changes To Third-Party Services	TPM-10	Mechanisms exist to control changes to services by suppliers, taking into account the criticality of business information, systems and processes that are in scope by the third-party.	5	
		Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
CC9.2-POF9	Implements Procedures for Terminating Vendor and Business Partner Relationships	Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity & data privacy requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
		Functional	intersects with	Break Clauses	TPM-05.7	Mechanisms exist to include "break clauses" within contracts for failure to meet contract criteria for cybersecurity and/or data privacy controls.	5	
		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 & data privacy controls, including any flow-down requirements to subcontractors.	5	
CC9.2-POF10	Obtains Confidentiality Commitments From Vendors and Business Partners	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity & data privacy requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
		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 & data privacy controls, including any flow-down requirements to subcontractors.	5	
CC9.2-POF11	Assesses Compliance With Confidentiality Commitments of Vendors and Business Partners	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Supply Chain Risk Assessment	RSK-09.1	Mechanisms exist to periodically assess supply chain risks associated with systems, system components and services.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Third-Party Risk Assessments & Approvals	TPM-04.1	Mechanisms exist to conduct a risk assessment prior to the acquisition or outsourcing of technology-related services.	5	
		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 & data privacy controls, including any flow-down requirements to subcontractors.	5	
CC9.2-POF12	Obtains Privacy Commitments From Vendors and Business Partners	Functional	intersects with	Supply Chain Risk Management (SCRM) Plan	RSK-09	Mechanisms exist to develop a plan for Supply Chain Risk Management (SCRM) associated with the development, acquisition, maintenance and disposal of systems, system components and services, including documenting selected mitigating actions and monitoring performance against those plans.	5	
		Functional	intersects with	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	5	
		Functional	intersects with	Supply Chain Protection	TPM-03	Mechanisms exist to evaluate security risks associated with the services and product supply chain.	5	
		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 & data privacy controls between internal stakeholders and External Service Providers (ESPs).	5	
		Functional	intersects with	Third-Party Scope Review	TPM-05.5	Mechanisms exist to perform recurring validation of the Responsible, Accountable, Supportive, Consulted & Informed (RASCI) matrix, or similar documentation, to ensure cybersecurity & data privacy control assignments accurately reflect current business practices, compliance obligations, technologies and stakeholders.	5	
		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 & data privacy controls, including any flow-down requirements to subcontractors.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
CC9.2-POF13	Assesses Compliance With Privacy Commitments of Vendors and Business Partners	Functional	intersects with	Threat Intelligence Program	THR-01	Mechanisms exist to implement a threat intelligence program that includes a cross-organization information-sharing capability that can influence the development of the system and security architectures, selection of security solutions, monitoring, threat hunting, response and recovery activities.	5	
		Functional	intersects with	Indicators of Exposure (IOE)	THR-02	Mechanisms exist to develop Indicators of Exposure (IOE) to understand the potential attack vectors that attackers could use to attack the organization.	5	
		Functional	intersects with	Threat Intelligence Feeds	THR-03	Mechanisms exist to maintain situational awareness of evolving threats by leveraging the knowledge of attacker tactics, techniques and procedures to facilitate the implementation of preventative and compensating controls.	5	
		Functional	intersects with	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 systems, applications and/or services that the organization utilizes.	5	
		Functional	intersects with	Monitoring for Third-Party Information Disclosure	TPM-07	Mechanisms exist to monitor for evidence of unauthorized exfiltration or disclosure of organizational information.	5	
		Functional	intersects with	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and audit External Service Providers (ESPs) for compliance with established contractual requirements for cybersecurity & data privacy controls.	5	
		Functional	intersects with	Vulnerability & Patch Management Program (VPMP)	VPM-01	Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls.	5	
		Functional	intersects with	Attack Surface Scope	VPM-01.1	Mechanisms exist to define and manage the scope for its attack surface management activities.	5	
		Functional	intersects with	Vulnerability Scanning	VPM-06	Mechanisms exist to detect vulnerabilities and configuration errors by recurring vulnerability scanning of systems and web applications.	5	
P1.0	Privacy Criteria Related to Notice and Communication of Objectives Related to Privacy	Functional	subset of	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data privacy controls.	10	
P1.1	The entity provides notice to data subjects about its privacy practices to meet the entity's objectives related to privacy. The notice is updated and communicated to data subjects in a timely manner for changes to the entity's privacy practices, including changes in the use of personal information, to meet the entity's objectives related to privacy.	Functional	intersects with	Privacy Act Statements	PRI-01.2	Mechanisms exist to provide additional formal notice to individuals from whom the information is being collected that includes: • Notice of the authority of organizations to collect Personal Data (PD); • Whether providing Personal Data (PD) is mandatory or optional; • The principal purpose or purposes for which the Personal Data (PD) is to be used; • The intended disclosures or routine uses of the information; and • The consequences of not providing all or some portion of the information requested.	5	
		Functional	intersects with	Dissemination of Data Privacy Program Information	PRI-01.3	Mechanisms exist to: • Ensure that the public has access to information about organizational data privacy activities and can communicate with its Chief Privacy Officer (CPO) or similar role; • Ensure that organizational data privacy practices are publicly available through organizational websites or document repositories; • Utilize publicly facing email addresses and/or phone lines to enable the public to provide feedback and/or direct questions to data privacy office(s) regarding data privacy practices; and • Inform data subjects when changes are made to the privacy notice and the nature of such changes.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
P1.1-POF1	Communicates to Data Subjects [C]	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
		Functional	intersects with	Purpose Specification	PRI-02.1	Mechanisms exist to identify and document the purpose(s) for which Personal Data (PD) is collected, used, maintained and shared in its data privacy notices.	5	
P1.1-POF2	Provides Notice to Data Subjects [C]	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
		Functional	intersects with	Purpose Specification	PRI-02.1	Mechanisms exist to identify and document the purpose(s) for which Personal Data (PD) is collected, used, maintained and shared in its data privacy notices.	5	
P1.1-POF3	Covers Entities and Activities in Notice [C]	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
		Functional	intersects with	Purpose Specification	PRI-02.1	Mechanisms exist to identify and document the purpose(s) for which Personal Data (PD) is collected, used, maintained and shared in its data privacy notices.	5	
P1.1-POF4	Uses Clear Language and Presents a Current Privacy Notice in a Location Easily Found by Data Subjects [C]	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
		Functional	intersects with	Purpose Specification	PRI-02.1	Mechanisms exist to identify and document the purpose(s) for which Personal Data (PD) is collected, used, maintained and shared in its data privacy notices.	5	
P1.1-POF5	Reviews the Privacy Notice [C]	Functional	intersects with	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity & data protection policies, standards and procedures.	5	
		Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
P1.1-POF6	Communicates Changes to Notice [C]	Functional	intersects with	Dissemination of Data Privacy Program Information	PRI-01.3	Mechanisms exist to: • Ensure that the public has access to information about organizational data privacy activities and can communicate with its Chief Privacy Officer (CPO) or similar role; • Ensure that organizational data privacy practices are publicly available through organizational websites or document repositories; • Utilize publicly facing email addresses and/or phone lines to enable the public to provide feedback and/or direct questions to data privacy office(s) regarding data privacy practices; and • Inform data subjects when changes are made to the privacy notice and the nature of such changes.	5	
P1.1-POF7	Retains Prior Notices [C]	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: • Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; • Ensures that data privacy notices are clear and easy-to-understand, expressing information about Personal Data (PD) processing in plain language that meets all legal obligations; • Defines the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; • Content of the privacy notice is periodically reviewed and updates made as necessary; and • Prior versions of the privacy notice are retained in accordance with data retention requirements.	5	
P2.0	Privacy Criteria Related to Choice and Consent	Functional	subset of	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	10	
P2.1	The entity communicates choices available regarding the collection, use, retention, disclosure, and disposal of personal information to the data subjects and the consequences, if any, of each choice. Explicit consent for the collection, use, retention, disclosure, and disposal of personal information is obtained from data subjects or other	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
P2.1	authorized persons, if required. Such consent is obtained only for the intended purpose of the information to meet the entity's objectives related to privacy. The entity's basis for determining implicit consent for the collection, use, retention, disclosure, and disposal of personal information is documented.	Functional	intersects with	Just-In-Time Notice & Updated Consent	PRI-03.2	Mechanisms exist to present authorizations to process Personal Data (PD) in conjunction with the data action, when: • The original circumstances under which an individual gave consent have changed; or • A significant amount of time has passed since an individual gave consent.	5	
P2.1-POF1	Communicates to Data Subjects [C]	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
P2.1-POF2	Communicates Consequences of Denying or Withdrawing Consent [C]	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
P2.1-POF3	Obtains Implicit or Explicit Consent [C]	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
P2.1-POF4	Documents and Obtains Consent for New Purposes and Uses [C]	Functional	intersects with	Just-In-Time Notice & Updated Consent	PRI-03.2	Mechanisms exist to present authorizations to process Personal Data (PD) in conjunction with the data action, when: • The original circumstances under which an individual gave consent have changed; or • A significant amount of time has passed since an individual gave consent.	5	
P2.1-POF5	Obtains Explicit Consent for Sensitive Information [C]	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
P2.1-POF6	Obtains Consent for Data Transfers [C]	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
P3.0	Privacy Criteria Related to Collection	Functional	subset of	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	10	
P3.1	Personal information is collected consistent with the entity's objectives related to privacy.	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	5	
		Functional	intersects with	Authority To Collect, Use, Maintain & Share Personal Data	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the collection, use, maintenance and sharing of Personal Data (PD), either generally or in support of a specific program or system need.	5	
P3.1-POF1	Limits the Collection of Personal Information [P][C]	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	5	
P3.1-POF2	Collects Information by Fair and Lawful Means [P][C]	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	5	
P3.1-POF3	Collects Information From Reliable Sources [P][C]	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	5	
		Functional	intersects with	Primary Sources	PRI-04.2	Mechanisms exist to ensure information is directly collected from the data subject, whenever possible.	5	
P3.1-POF4	Informs Data Subjects When Additional Information Is Acquired [P][C]	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to collect Personal Data (PD) only for the purposes identified in the data privacy notice and includes protections against collecting PD from minors without appropriate parental, or legal guardian, consent.	5	
		Functional	intersects with	Notice of Correction or Processing Change	PRI-06.2	Mechanisms exist to notify affected data subjects if their Personal Data (PD) has been corrected or amended.	5	
P3.2	For information requiring explicit consent, the entity communicates the need for such consent as well as the consequences of a failure to provide consent for the request for personal information and obtains the consent prior to the collection of the information to meet the entity's objectives related to privacy.	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
		Functional	intersects with	Just-In-Time Notice & Updated Consent	PRI-03.2	Mechanisms exist to present authorizations to process Personal Data (PD) in conjunction with the data action, when: • The original circumstances under which an individual gave consent have changed; or • A significant amount of time has passed since an individual gave consent.	5	
P3.2-POF1	Informs Data Subjects of Consequences of Failure to Provide Consent [C]	Functional	intersects with	Tailored Consent	PRI-03.1	Mechanisms exist to allow data subjects to modify the use permissions to selected attributes of their Personal Data (PD).	5	
P3.2-POF2	Documents Explicit Consent to Retain Information [C]	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to authorize the processing of their Personal Data (PD) prior to its collection that: • Uses plain language and provide examples to illustrate the potential data privacy risks of the authorization; and • Provides a means for users to decline the authorization.	5	
P4.0	Privacy Criteria Related to Use, Retention, and Disposal	Functional	subset of	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	10	
		Functional	subset of	Usage Restrictions of Sensitive Personal Data	PRI-05.4	Mechanisms exist to restrict the use of Personal Data (PD) to only the authorized purpose(s) consistent with applicable laws, regulations and in data privacy notices.	10	
P4.1	The entity limits the use of personal information to the purposes identified in the entity's objectives related to privacy.	Functional	intersects with	Internal Use of Personal Data For Testing, Training and Research	PRI-05.1	Mechanisms exist to address the use of Personal Data (PD) for internal testing, training and research that: • Takes measures to limit or minimize the amount of PD used for internal testing, training and research purposes; and • Authorizes the use of PD when such information is required for internal testing, training and research.	5	
		Functional	intersects with	Usage Restrictions of Sensitive Personal Data	PRI-05.4	Mechanisms exist to restrict the use of Personal Data (PD) to only the authorized purpose(s) consistent with applicable laws, regulations and in data privacy notices.	5	
P4.1-POF1	Uses Personal Information for Intended Purposes [P][C]	Functional	intersects with	Usage Restrictions of Sensitive Personal Data	PRI-05.4	Mechanisms exist to restrict the use of Personal Data (PD) to only the authorized purpose(s) consistent with applicable laws, regulations and in data privacy notices.	5	
P4.2	The entity retains personal information consistent with the entity's objectives related to privacy.	Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
P4.2-POF1	Retains Personal Information [P][C]	Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
P4.2-POF2	Protects Personal Information [P][C]	Functional	intersects with	Security of Personal Data	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
		Functional	intersects with	Sanitization of Personal Data (PD)	DCH-09.3	Mechanisms exist to facilitate the sanitization of Personal Data (PD).	5	
		Functional	intersects with	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
P4.3	The entity securely disposes of personal information to meet the entity's objectives related to privacy.	Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
P4.3-POF1	Captures, Identifies, and Flags Requests for Deletion [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
		Functional	intersects with	Right to Erasure	PRI-06.5	Mechanisms exist to erase Personal Data (PD) of a data subject, without delay.	5	
P4.3-POF2	Disposes of, Destroys, and Redacts Personal Information [P][C]	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	
		Functional	intersects with	Physical Media Disposal	DCH-08	Mechanisms exist to securely dispose of media when it is no longer required, using formal procedures.	5	
		Functional	intersects with	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	5	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
P4.3-POF3	Destroys Personal Information [P][C]	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	
		Functional	intersects with	Physical Media Disposal	DCH-08	Mechanisms exist to securely dispose of media when it is no longer required, using formal procedures.	5	
		Functional	intersects with	Information Disposal	DCH-21	Mechanisms exist to securely dispose of, destroy or erase information.	5	
		Functional	intersects with	Personal Data Retention & Disposal	PRI-05	Mechanisms exist to: • Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; • Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and • Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
P5.0	Privacy Criteria Related to Access	Functional	subset of	Data Subject Access	PRI-06	Mechanisms exist to provide data subjects the ability to access their Personal Data (PD) maintained in organizational systems of records.	10	
P5.1	The entity grants identified and authenticated data subjects the ability to access their stored personal information for review and, upon request, provides physical or electronic copies of that information to data subjects to meet the entity's objectives related to privacy. If access is denied, data subjects are informed of the denial and reason for such denial, as required, to meet the entity's objectives related to privacy.	Functional	intersects with	Updating & Correcting Personal Data (PD)	DCH-22.1	Mechanisms exist to utilize technical controls to correct Personal Data (PD) that is inaccurate or outdated, incorrectly determined regarding impact, or incorrectly de-identified.	5	
		Functional	intersects with	Data Subject Access	PRI-06	Mechanisms exist to provide data subjects the ability to access their Personal Data (PD) maintained in organizational systems of records.	5	
		Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P5.1-POF1	Responds to Data Controller Requests [P]	Functional	intersects with	Data Subject Access	PRI-06	Mechanisms exist to provide data subjects the ability to access their Personal Data (PD) maintained in organizational systems of records.	5	
P5.1-POF2	Authenticates Data Subjects' Identity [P][C]	Functional	intersects with	Data Subject Access	PRI-06	Mechanisms exist to provide data subjects the ability to access their Personal Data (PD) maintained in organizational systems of records.	5	
P5.1-POF3	Permits Data Subjects Access to Their Personal Information [P][C]	Functional	intersects with	Data Subject Access	PRI-06	Mechanisms exist to provide data subjects the ability to access their Personal Data (PD) maintained in organizational systems of records.	5	
P5.1-POF4	Provides Understandable Personal Information Within Reasonable Time [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
		Functional	intersects with	Reject Unauthorized Disclosure Requests	PRI-07.4	Mechanisms exist to reject unauthorized disclosure requests.	5	
P5.1-POF5	Informs Data Subjects If Access Is Denied [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P5.2	The entity corrects, amends, or appends personal information based on information provided by data subjects and communicates such information to third parties, as committed or required, to meet the entity's objectives related to privacy. If a request for correction is denied, data subjects are informed of the denial and reason for such denial to meet the entity's objectives related to privacy.	Functional	intersects with	Updating & Correcting Personal Data (PD)	DCH-22.1	Mechanisms exist to utilize technical controls to correct Personal Data (PD) that is inaccurate or outdated, incorrectly determined regarding impact, or incorrectly de-identified.	5	
		Functional	intersects with	Correcting Inaccurate Personal Data	PRI-06.1	Mechanisms exist to establish and implement a process for: • Data subjects to have inaccurate Personal Data (PD) maintained by the organization corrected or amended; and • Disseminating corrections or amendments of PD to other authorized users of the PD.	5	
		Functional	intersects with	Notice of Correction or Processing Change	PRI-06.2	Mechanisms exist to notify affected data subjects if their Personal Data (PD) has been corrected or amended.	5	
		Functional	intersects with	Appeal Adverse Decision	PRI-06.3	Mechanisms exist to provide an organization-defined process for data subjects to appeal an adverse decision and have incorrect information amended.	5	
		Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
		Functional	intersects with	Updating Personal Data (PD)	PRI-12	Mechanisms exist to develop processes to identify and record the method under which Personal Data (PD) is updated and the frequency that such updates occur.	5	
P5.2-POF1	Responds to Data Controller Requests [P]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
		Functional	intersects with	Reject Unauthorized Disclosure Requests	PRI-07.4	Mechanisms exist to reject unauthorized disclosure requests.	5	
P5.2-POF2	Communicates Denial of Access Requests [P][C]	Functional	intersects with	Correcting Inaccurate Personal Data	PRI-06.1	Mechanisms exist to establish and implement a process for: • Data subjects to have inaccurate Personal Data (PD) maintained by the organization corrected or amended; and • Disseminating corrections or amendments of PD to other authorized users of the PD.	5	
		Functional	intersects with	Notice of Correction or Processing Change	PRI-06.2	Mechanisms exist to notify affected data subjects if their Personal Data (PD) has been corrected or amended.	5	
		Functional	intersects with	Updating Personal Data (PD)	PRI-12	Mechanisms exist to develop processes to identify and record the method under which Personal Data (PD) is updated and the frequency that such updates occur.	5	
P5.2-POF3	Permits Data Subjects to Update or Correct Personal Information [P][C]	Functional	intersects with	Notice of Correction or Processing Change	PRI-06.2	Mechanisms exist to notify affected data subjects if their Personal Data (PD) has been corrected or amended.	5	
		Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
		Functional	intersects with	Reject Unauthorized Disclosure Requests	PRI-07.4	Mechanisms exist to reject unauthorized disclosure requests.	5	
P5.2-POF4	Communicates Denial of Correction Requests [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P6.0	Privacy Criteria Related to Disclosure and Notification	Functional	subset of	Disclosure of Information	DCH-03.1	Mechanisms exist to restrict the disclosure of sensitive / regulated data to authorized parties with a need to know.	10	
P6.1	The entity discloses personal information to third parties with the explicit consent of data subjects and such consent is obtained prior to disclosure to meet the entity's objectives related to privacy.	Functional	intersects with	Information Sharing With Third Parties	PRI-07	Mechanisms exist to disclose Personal Data (PD) to third-parties only for the purposes identified in the data privacy notice and with the implicit or explicit consent of the data subject.	5	
		Functional	intersects with	Information Sharing With Third Parties	PRI-07	Mechanisms exist to disclose Personal Data (PD) to third-parties only for the purposes identified in the data privacy notice and with the implicit or explicit consent of the data subject.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
P6.1-POF1	Communicates Privacy Policies to Third Parties [P][C]	Functional	intersects with	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
P6.1-POF2	Discloses Personal Information Only When Appropriate [P][C]	Functional	intersects with	Disclosure of Information	DCH-03.1	Mechanisms exist to restrict the disclosure of sensitive / regulated data to authorized parties with a need to know.	5	
		Functional	intersects with	Limiting Personal Data Disclosures	PRI-01.7	Mechanisms exist to limit the disclosure of Personal Data (PD) to authorized parties for the sole purpose for which the PD was obtained.	5	
P6.1-POF3	Discloses Personal Information Only to Appropriate Third Parties [P][C]	Functional	intersects with	Disclosure of Information	DCH-03.1	Mechanisms exist to restrict the disclosure of sensitive / regulated data to authorized parties with a need to know.	5	
		Functional	intersects with	Limiting Personal Data Disclosures	PRI-01.7	Mechanisms exist to limit the disclosure of Personal Data (PD) to authorized parties for the sole purpose for which the PD was obtained.	5	
P6.1-POF4	Discloses Information to Third Parties for New Purposes and Uses [P][C]	Functional	intersects with	Disclosure of Information	DCH-03.1	Mechanisms exist to restrict the disclosure of sensitive / regulated data to authorized parties with a need to know.	5	
		Functional	intersects with	Limiting Personal Data Disclosures	PRI-01.7	Mechanisms exist to limit the disclosure of Personal Data (PD) to authorized parties for the sole purpose for which the PD was obtained.	5	
P6.2	The entity creates and retains a complete, accurate, and timely record of authorized disclosures of personal information to meet the entity's objectives related to privacy.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	Mechanisms exist to develop and maintain an accounting of disclosures of Personal Data (PD) held by the organization and make the accounting of disclosures available to the person named in the record, upon request.	5	
P6.2-POF1	Creates and Retains Record of Authorized Disclosures [P][C]	Functional	subset of	Accounting of Disclosures	PRI-14.1	Mechanisms exist to develop and maintain an accounting of disclosures of Personal Data (PD) held by the organization and make the accounting of disclosures available to the person named in the record, upon request.	10	
P6.3	The entity creates and retains a complete, accurate, and timely record of detected or reported unauthorized disclosures (including breaches) of personal information to meet the entity's objectives related to privacy.	Functional	intersects with	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
		Functional	intersects with	Information Spillage Response	IRO-12	Mechanisms exist to respond to sensitive information spills.	5	
		Functional	intersects with	Accounting of Disclosures	PRI-14.1	Mechanisms exist to develop and maintain an accounting of disclosures of Personal Data (PD) held by the organization and make the accounting of disclosures available to the person named in the record, upon request.	5	
P6.3-POF1	Creates and Retains Record of Detected or Reported Unauthorized Disclosures [P] [C]	Functional	subset of	Accounting of Disclosures	PRI-14.1	Mechanisms exist to develop and maintain an accounting of disclosures of Personal Data (PD) held by the organization and make the accounting of disclosures available to the person named in the record, upon request.	10	
P6.4	The entity obtains privacy commitments from vendors and other third parties who have access to personal information to meet the entity's objectives related to privacy. The entity assesses those parties' compliance on a periodic and as-needed basis and takes corrective action, if necessary.	Functional	subset of	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	10	
P6.4-POF1	Evaluates Third-Party Compliance With Privacy Commitments [P][C]	Functional	intersects with	Disclosure of Information	DCH-03.1	Mechanisms exist to restrict the disclosure of sensitive / regulated data to authorized parties with a need to know.	5	
		Functional	intersects with	Limiting Personal Data Disclosures	PRI-01.7	Mechanisms exist to limit the disclosure of Personal Data (PD) to authorized parties for the sole purpose for which the PD was obtained.	5	
P6.4-POF2	Remediates Misuse of Personal Information by a Third Party [P][C]	Functional	intersects with	Limit Potential Harm	TPM-03.2	Mechanisms exist to utilize security safeguards to limit harm from potential adversaries who identify and target the organization's supply chain.	5	
		Functional	intersects with	Break Clauses	TPM-05.7	Mechanisms exist to include "break clauses" within contracts for failure to meet contract criteria for cybersecurity and/or data privacy controls.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
P6.4-POF3	Obtains Commitments to Report Unauthorized Disclosures [P][C]	Functional	intersects with	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
		Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
		Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity & data privacy requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
P6.5	The entity obtains commitments from vendors and other third parties with access to personal information to notify the entity in the event of actual or suspected unauthorized disclosures of personal information. Such notifications are reported to appropriate personnel and acted on in accordance with established incident-response procedures to meet the entity's objectives related to privacy.	Functional	intersects with	Third-Party Incident Response & Recovery Capabilities	TPM-11	Mechanisms exist to ensure response/recovery planning and testing are conducted with critical suppliers/providers.	5	
P6.5-POF1	Remediates Misuse of Personal Information by a Third Party [P][C]	Functional	intersects with	Limit Potential Harm	TPM-03.2	Mechanisms exist to utilize security safeguards to limit harm from potential adversaries who identify and target the organization's supply chain.	5	
		Functional	intersects with	Break Clauses	TPM-05.7	Mechanisms exist to include "break clauses" within contracts for failure to meet contract criteria for cybersecurity and/or data privacy controls.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
P6.5-POF2	Reports Actual or Suspected Unauthorized Disclosures [P][C]	Functional	intersects with	Limit Potential Harm	TPM-03.2	Mechanisms exist to utilize security safeguards to limit harm from potential adversaries who identify and target the organization's supply chain.	5	
		Functional	intersects with	Break Clauses	TPM-05.7	Mechanisms exist to include "break clauses" within contracts for failure to meet contract criteria for cybersecurity and/or data privacy controls.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
P6.6	The entity provides notification of breaches and incidents to affected data subjects, regulators, and others to meet the entity's objectives related to privacy.	Functional	intersects with	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	5	
		Functional	intersects with	Third-Party Incident Response & Recovery Capabilities	TPM-11	Mechanisms exist to ensure response/recovery planning and testing are conducted with critical suppliers/providers.	5	
P6.6-POF1	Identifies Reporting Requirements [P][C]	Functional	intersects with	Limit Potential Harm	TPM-03.2	Mechanisms exist to utilize security safeguards to limit harm from potential adversaries who identify and target the organization's supply chain.	5	
		Functional	intersects with	Break Clauses	TPM-05.7	Mechanisms exist to include "break clauses" within contracts for failure to meet contract criteria for cybersecurity and/or data privacy controls.	5	
		Functional	intersects with	Third-Party Deficiency Remediation	TPM-09	Mechanisms exist to address weaknesses or deficiencies in supply chain elements identified during independent or organizational assessments of such elements.	5	
P6.6-POF2	Provides Notice of Breaches and Incidents [P][C]	Functional	equal	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	10	
P6.7	The entity provides data subjects with an accounting of the personal information held and disclosure of the data subjects' personal information, upon the data subjects' request, to meet the entity's objectives related to privacy.	Functional	intersects with	Data Breach	IRO-04.1	Mechanisms exist to address data breaches, or other incidents involving the unauthorized disclosure of sensitive or regulated data, according to applicable laws, regulations and contractual obligations.	5	
		Functional	intersects with	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: • Internal stakeholders; • Affected clients & third-parties; and • Regulatory authorities.	5	
P6.7-POF1	Responds to Data Controller Requests [P]	Functional	intersects with	Purpose Specification	PRI-02.1	Mechanisms exist to identify and document the purpose(s) for which Personal Data (PD) is collected, used, maintained and shared in its data privacy notices.	5	
		Functional	intersects with	Authority To Collect, Use, Maintain & Share Personal Data	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the collection, use, maintenance and sharing of Personal Data (PD), either generally or in support of a specific program or system need.	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
P6.7-POF2	Identifies Types of Personal Information and Handling Process [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
		Functional	intersects with	Data Portability	PRI-06.6	Mechanisms exist to export Personal Data (PD) in a structured, commonly used and machine-readable format that allows the data subject to transmit the data to another controller without hindrance.	5	
		Functional	intersects with	Personal Data Exportability	PRI-06.7	Mechanisms exist to digitally export Personal Data (PD) in a secure manner upon request by the data subject.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
P6.7-POF3	Captures, Identifies, and Communicates Requests for Information [P][C]	Functional	intersects with	Data Subject Communications	PRI-17	Mechanisms exist to craft disclosures and communications to data subjects such that the material is readily accessible and written in a manner that is concise, unambiguous and understandable by a reasonable person.	5	
		Functional	intersects with	Data Controller Communications	PRI-18	Mechanisms exist to receive and respond to contractual obligations from data controllers that includes: • Data subject requests; • Updates/corrections to Personal Data (PD); • Disclosures of PD; and • Accounting for PD that is stored, processed and/or transmitted on behalf of the data controller.	5	
P7.0	Privacy Criteria Related to Quality	Functional	intersects with	Data Quality Management	PRI-10	Mechanisms exist to issue guidelines ensuring and maximizing the quality, utility, objectivity, integrity, impact determination and de-identification of Personal Data (PD) across the information lifecycle.	5	
P7.1	The entity collects and maintains accurate, up-to-date, complete, and relevant personal information to meet the entity's objectives related to privacy.	Functional	intersects with	Data Quality Management	PRI-10	Mechanisms exist to issue guidelines ensuring and maximizing the quality, utility, objectivity, integrity, impact determination and de-identification of Personal Data (PD) across the information lifecycle.	5	
P7.1-POF1	Ensures Accuracy and Completeness of Personal Information [P][C]	Functional	intersects with	Data Quality Management	PRI-10	Mechanisms exist to issue guidelines ensuring and maximizing the quality, utility, objectivity, integrity, impact determination and de-identification of Personal Data (PD) across the information lifecycle.	5	
P7.1-POF2	Ensures Relevance of Personal Information [P][C]	Functional	intersects with	Data Quality Management	PRI-10	Mechanisms exist to issue guidelines ensuring and maximizing the quality, utility, objectivity, integrity, impact determination and de-identification of Personal Data (PD) across the information lifecycle.	5	
P8.0	Privacy Criteria Related to Monitoring and Enforcement	Functional	intersects with	Testing, Training & Monitoring	PRI-08	Mechanisms exist to conduct cybersecurity & data privacy testing, training and monitoring activities	5	
P8.1	The entity implements a process for receiving, addressing, resolving, and communicating the resolution of inquiries, complaints, and disputes from data subjects and others and periodically monitors compliance to meet the entity's objectives related to privacy. Corrections and other necessary actions related to identified deficiencies are made or taken in a timely manner.	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P8.1-POF1	Communicates to Data Subjects or Data Controllers [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P8.1-POF2	Addresses Inquiries, Complaints, and Disputes [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P8.1-POF3	Documents and Communicates Dispute Resolution and Recourse [P][C]	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to implement a process for receiving and responding to complaints, concerns or questions from data subjects about the organizational data privacy practices.	5	
P8.1-POF4	Documents and Reports Compliance Review Results [P][C]	Functional	intersects with	Data Privacy Records & Reporting	PRI-14	Mechanisms exist to maintain data privacy-related records and develop, disseminate and update reports to internal senior management, as well as external oversight bodies, as appropriate, to demonstrate accountability with specific statutory and regulatory data privacy program mandates.	5	
P8.1-POF5	Documents and Reports Instances of Noncompliance [P][C]	Functional	intersects with	Data Privacy Records & Reporting	PRI-14	Mechanisms exist to maintain data privacy-related records and develop, disseminate and update reports to internal senior management, as well as external oversight bodies, as appropriate, to demonstrate accountability with specific statutory and regulatory data privacy program mandates.	5	
P8.1-POF6	Performs Ongoing Monitoring [P][C]	Functional	intersects with	Testing, Training & Monitoring	PRI-08	Mechanisms exist to conduct cybersecurity & data privacy testing, training and monitoring activities	5	
PI1.1	The entity obtains or generates, uses, and communicates relevant, quality information regarding the objectives related to processing, including definitions of data processed and product and service specifications, to support the use of products and services.	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on systems, applications and services that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
		Functional	intersects with	Criticality Analysis	TDA-06.1	Mechanisms exist to require the developer of the system, system component or service to perform a criticality analysis at organization-defined decision points in the Secure Development Life Cycle (SDLC).	5	
PI1.1-POF1	Identifies Functional and Nonfunctional Requirements and Information Specifications	Functional	intersects with	Cybersecurity & Data Privacy Requirements Definition	PRM-05	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical systems, system components or services at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Product Management	TDA-01.1	Mechanisms exist to design and implement product management processes to update products, including systems, software and services, to improve functionality and correct security deficiencies.	5	
		Functional	intersects with	Minimum Viable Product (MVP) Security Requirements	TDA-02	Mechanisms exist to ensure risk-based technical and functional specifications are established to define a Minimum Viable Product (MVP).	5	
PI1.1-POF2	Defines Data Necessary to Support a Product or Service	Functional	intersects with	Cybersecurity & Data Privacy Requirements Definition	PRM-05	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical systems, system components or services at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
		Functional	intersects with	Product Management	TDA-01.1	Mechanisms exist to design and implement product management processes to update products, including systems, software and services, to improve functionality and correct security deficiencies.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
		Functional	intersects with	Minimum Viable Product (MVP) Security Requirements	TDA-02	Mechanisms exist to ensure risk-based technical and functional specifications are established to define a Minimum Viable Product (MVP).	5	
PI1.1-POF3	Defines Information Necessary to Support the Use of a Good or Product	Functional	intersects with	Cybersecurity & Data Privacy Requirements Definition	PRM-05	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical systems, system components or services at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
		Functional	intersects with	Product Management	TDA-01.1	Mechanisms exist to design and implement product management processes to update products, including systems, software and services, to improve functionality and correct security deficiencies.	5	
		Functional	intersects with	Minimum Viable Product (MVP) Security Requirements	TDA-02	Mechanisms exist to ensure risk-based technical and functional specifications are established to define a Minimum Viable Product (MVP).	5	
PI1.2	The entity implements policies and procedures over system inputs, including controls over completeness and accuracy, to result in products, services, and reporting to meet the entity's objectives	Functional	subset of	Technology Development & Acquisition	TDA-01	Mechanisms exist to facilitate the implementation of tailored development and acquisition strategies, contract tools and procurement methods to meet unique business needs.	10	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.2-POF1	Defines Characteristics of Processing Inputs	Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
		Functional	intersects with	Input Data Validation	TDA-18	Mechanisms exist to check the validity of information inputs.	5	
PI1.2-POF2	Evaluates Processing Inputs	Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
		Functional	intersects with	Input Data Validation	TDA-18	Mechanisms exist to check the validity of information inputs.	5	
PI1.2-POF3	Creates and Maintains Records of System Inputs	Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
		Functional	intersects with	Input Data Validation	TDA-18	Mechanisms exist to check the validity of information inputs.	5	
PI1.3	The entity implements policies and procedures over system processing to result in products, services,	Functional	subset of	Technology Development & Acquisition	TDA-01	Mechanisms exist to facilitate the implementation of tailored development and acquisition strategies, contract tools and procurement methods to meet unique business needs.	10	
		Functional	equal	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	10	
PI1.3-POF1	Defines Processing Specifications	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.3-POF2	Defines Processing Activities	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.3-POF3	Detects and Corrects Processing or Production Activity Errors	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.3-POF4	Records System Processing Activities	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.3-POF5	Processes Inputs	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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.4	The entity implements policies and procedures to make available or deliver output completely, accurately, and timely in accordance with specifications to meet the entity's objectives	Functional	intersects with	Content of Event Logs	MON-03	Mechanisms exist to configure systems to produce event logs that contain sufficient information to, at a minimum: • Establish what type of event occurred; • When (date and time) the event occurred; • Where the event occurred; • The source of the event; • The outcome (success or failure) of the event; and • The identity of any user/subject associated with the event.	5	

FDE #	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
	timely in accordance with specifications to meet the entity's objectives.	Functional	intersects with	Protection of Event Logs	MON-08	Mechanisms exist to protect event logs and audit tools from unauthorized access, modification and deletion.	5	
		Functional	intersects with	Access Control for Output Devices	PES-12.2	Physical security mechanisms exist to restrict access to printers and other system output devices to prevent unauthorized individuals from obtaining the output.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.4-POF1	Protects Output	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.4-POF2	Distributes Output Only to Intended Parties	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.4-POF3	Distributes Output Completely and Accurately	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.4-POF4	Creates and Maintains Records of System Output Activities	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.5	The entity implements policies and procedures to store inputs, items in processing, and outputs completely, accurately, and timely in accordance with system specifications to meet the entity's objectives.	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		Functional	intersects with	Media & Data Retention	DCH-18	Mechanisms exist to retain media and data in accordance with applicable statutory, regulatory and contractual obligations.	5	
		Functional	intersects with	Protection of Event Logs	MON-08	Mechanisms exist to protect event logs and audit tools from unauthorized access, modification and deletion.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.5-POF1	Protects Stored Items	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.5-POF2	Archives and Protects System Records	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
PI1.5-POF3	Stores Data Completely and Accurately	Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	
		Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	
		Functional	intersects with	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	5	
		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	

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PI1.5-POF4	Creates and Maintains Records of System Storage Activities	Functional	intersects with	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity & data privacy that determines: • The resulting risk to organizational operations, assets, individuals and other organizations; and • Information protection needs arising from the defined business processes and revises the processes as necessary, until an achievable set of protection needs is obtained.	5	
		Functional	intersects with	Secure Coding	TDA-06	Mechanisms exist to develop applications based on secure coding principles.	5	