

Physical & Environmental Security (PES)**NIST CSF PR.AC-2 PHYSICAL ACCESS CONTROL**Procedure/Control Activity:

- (1) Follows appropriate industry-expected guidelines to implement and govern physical security controls, in accordance with Board policies, District administrative procedures, and standards implemented.
- (2) Enforces physical access authorizations for all physical access points (including designated entry/exit points) to District-owned or operated facilities.
- (3) Verifies individual access authorizations before granting access to the facility.
- (4) Controls access to areas based on the physical security zone requirements.
- (5) Secures keys, combinations, and other physical access devices.
- (6) Changes or replaces combinations and keys when keys are lost, combinations are compromised, or when an employee is transferred or is no longer employed by the District .
- (7) Issues a visitor a physical token (e.g., a badge or access device) that:
 - a. Identifies the visitor as being not an onsite employee;
 - b. Is surrendered by the visitor before leaving the facility or at the date of expiration; and
 - c. Expires through automated or visual means (e.g., different color for each day, date/time on school provided name badge, etc..).
- (8) On at least an annual basis, review the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever a process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (9) If necessary, request corrective action to address identified deficiencies.
- (10) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.
- (11) If necessary, document the results of corrective action and note findings.

NIST CSF DE.CM-2 MONITORING PHYSICAL ACCESSProcedure/Control Activity:

- (1) Follows appropriate industry-expected practices to perform physical access monitoring, in accordance with Board policies, District administrative procedures, and standards, including:
 - a. Using video cameras, surveillance equipment and/or physical access control mechanisms to monitor individual physical access to sensitive areas;
 - b. Investigating and responding to detected physical security incidents, per documented procedures;
 - c. Performing security checks at the physical boundary of the facility or system for unauthorized exfiltration of information or system components;
 - d. Reviewing collected data and correlating with other entries; and
 - e. Retaining physical access data for at least three (3) months, unless otherwise restricted by law.
- (2) On at least an annual basis, reviews the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever the process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.
- (5) If necessary, document the results of corrective action and note findings.

Physical & Environmental Security (PES)**NIST CSF PR.DS-5 INFORMATION LEAKAGE DUE TO ELECTROMAGNETIC SIGNAL EMANATIONS**Procedure/Control Activity:

- (1) Implements appropriate physical, administrative and technical means to secure facilities to reduce the chance of information leakage due to electromagnetic signal emanations through:
 - a. The proper placement of Wireless Access Points (WAPs);
 - b. Limiting the output/transmission power of the WAPs; and
 - c. Ensuring users are educated about positioning monitors to minimize the risk of unauthorized individuals being able to intentionally or inadvertently view the screen.
- (2) On at least an annual basis, review the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever the process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.
- (5) If necessary, document the results of corrective action and note findings.

Risk Management

NIST CSF ID.GV-4: RISK MANAGEMENT PROGRAM

Procedure/Control Activity:

- (1) Uses vendor-recommended settings and industry-recognized secure practices to ensure controls are sufficient for managing risk that include:
 - a. A formal Risk Management Program (RMP) that includes:
 - i. An unambiguous expression of the risk tolerance;
 - ii. Acceptable risk assessment methodologies; and
 - iii. Risk mitigation strategies.
 - b. A process for consistently evaluating and monitoring risk over time;
 - c. A process for conducting risk assessments annually and upon significant changes to the district environment;
 - d. Identification of:
 - i. Critical assets;
 - ii. Current safeguards; and
 - iii. Effectiveness of safeguards against threats and vulnerabilities.
 - e. A review of processes involving creating, receiving, maintaining and transmitting of sensitive data; and
 - f. Assignment of responsibility to validate security controls.
- (2) As needed, revise processes to address necessary changes and evolving conditions. Whenever a process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.
- (5) If necessary, document the results of corrective action and note findings.

NIST CSF ID.RA-3: Risk Identification

Procedure/Control Activity:

- (1) Implements appropriate administrative means to leverage the district's Risk Management Program (RMP) to identify, document and report risk.
- (2) As needed, revise risk profile to address necessary changes.
- (3) As needed, revise processes to address necessary changes and evolving conditions. Whenever a process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (4) If necessary, request corrective action to address identified deficiencies.
- (5) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.
- (6) If necessary, document the results of corrective action and note findings.

NIST CSF ID.RA-6 RISK REMEDIATION

Procedure/Control Activity:

- (1) Implements appropriate administrative means to leverage the appropriate Risk Management Program (RMP) to:
 - a. Mitigate risks to an acceptable level; or
 - b. Conduct remediation actions, based on risk criteria, in accordance with reasonable resolution time frames and stakeholder approval.
- (2) On at least an annual basis, review the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever a process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.

NIST CSF ID.RA-4 BUSINESS IMPACT ANALYSIS (BIAS)

Procedure/Control Activity:

- (1) Implements appropriate administrative means to utilize a defined and documented method for determining the impact of any disruption to the district's business operations (e.g., Business Impact Analysis (BIA)) that incorporates the following:
 - a. Identifies critical products and services;
 - b. Identifies all dependencies, including processes, applications, business partners, and third-party service providers;
 - c. Understands threats to critical products and services;
 - d. Determines impacts resulting from planned or unplanned disruptions and how these vary over time;
 - e. Establishes the maximum tolerable period of disruption;
 - f. Establishes priorities for recovery;
 - g. Establishes recovery time objectives for resumption of critical products and services within their maximum tolerable period of disruption; and
 - h. Estimates the resources required for resumption.
- (2) On at least an annual basis, review the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever a process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.

Secure Engineering & Architecture (SE)**NIST CSF PR.IP-1 SECURE ENGINEERING PRINCIPLES**Procedure/Control Activity:

- (1) Uses vendor-recommended settings and industry-recognized secure practices to ensure controls are sufficient for applying industry-recognized secure practices engineering principles in the specification, design, development, implementation, and modification of systems. These include:
 - a. Implementing configuration standards for all system components that address known security vulnerabilities and are consistent with industry-accepted system hardening standards;
 - b. Developing layered protections;
 - c. Establishing sound security architecture and controls as the foundation for design;
 - d. Incorporating security requirements into the Secure Development Life Cycle (SDLC);
 - e. Delineating physical and logical security boundaries;
 - f. Ensuring system developers are trained on how to build secure software;
 - g. Tailoring security controls to meet organizational and operational needs;
 - h. Performing threat modeling to identify use cases, threat agents, attack vectors, and attack patterns as well as compensating controls and design patterns needed to mitigate risk; and
 - i. Reducing risk to acceptable levels, thus enabling informed risk management decisions.
- (2) On at least an annual basis, review the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever a process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.

NIST CSF PR.PT-5 FAIL SECURE

Procedure/Control Activity:

- (1) Uses vendor-recommended settings and industry-recognized secure practices to configure critical assets to fail in a known state or safe mode in order to preserve system state information at the time of the failure if possible.
- (2) On at least an annual basis, review the process for non-conforming instances. As needed, revise processes to address necessary changes and evolving conditions. Whenever the process is updated:
 - a. Distribute copies of the change to key District personnel; and
 - b. Communicate the changes and updates to key District personnel.
- (3) If necessary, request corrective action to address identified deficiencies.
- (4) If necessary, validate that corrective action occurred to appropriately remediate deficiencies.