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# Cyber Friday:

## NIST SP 800.171 – 3.9 Personnel Security and 3.10 Physical Protection

October 27 | 11:00 am - Noon

Presented by:  
Matt Frost, WPI



# Webinar Etiquette

## PLEASE

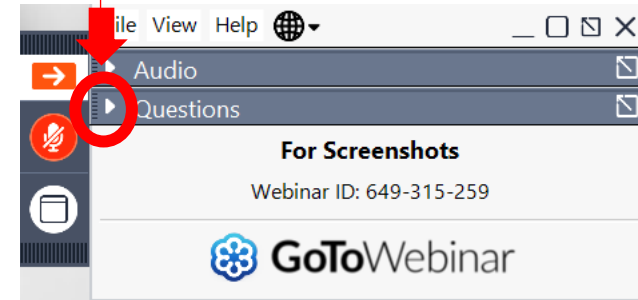
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The APEX Accelerators program, under management of the Department of Defense (DOD) Office of Small Business Programs (OSBP), plays a critical role in the Department's efforts to identify and engage with a wide range of businesses entering and participating in the defense supply-chain. The program provides the education and training that all businesses need to participate to become capable of participating in DOD and other government contracts.

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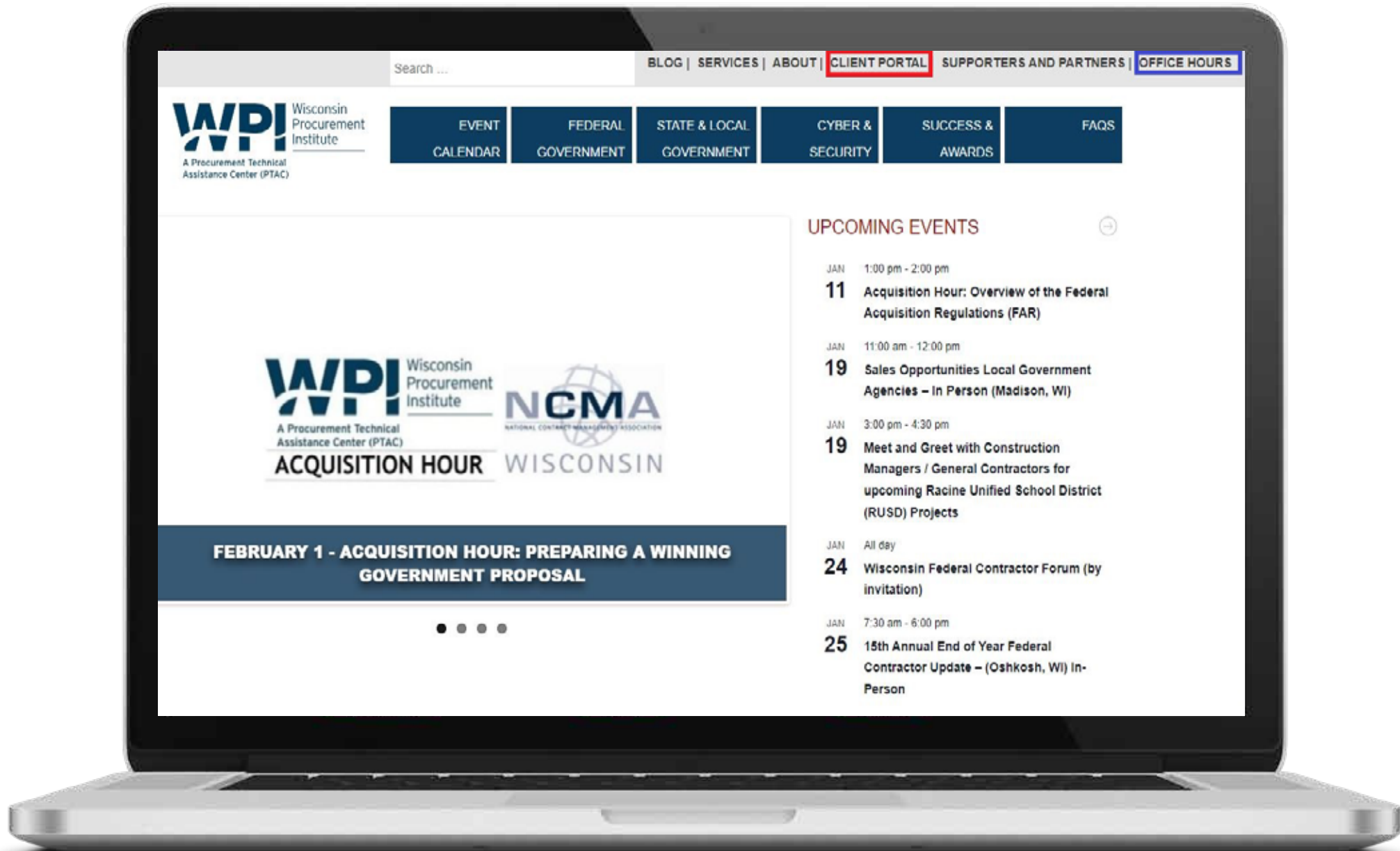
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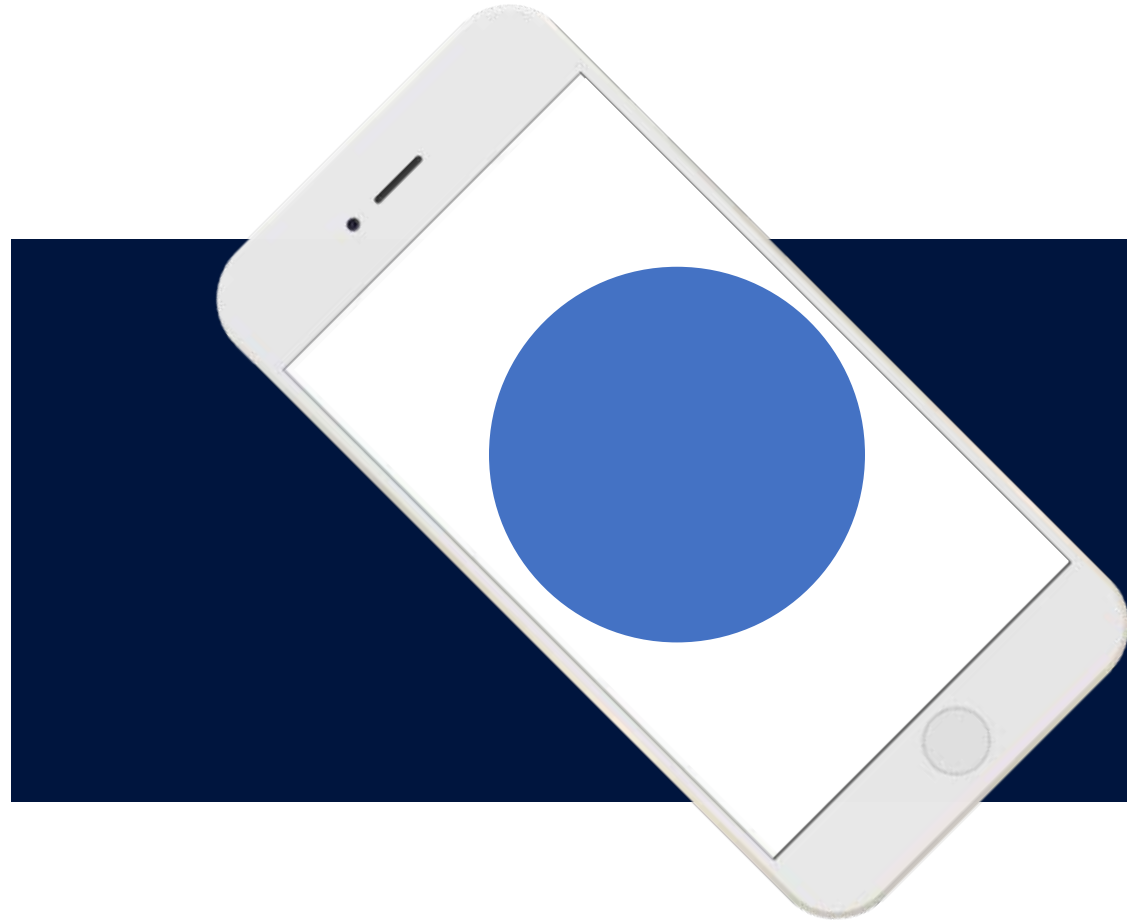


### UPCOMING EVENTS

- JAN 1:00 pm - 2:00 pm  
**11 Acquisition Hour: Overview of the Federal Acquisition Regulations (FAR)**
- JAN 11:00 am - 12:00 pm  
**19 Sales Opportunities Local Government Agencies – In Person (Madison, WI)**
- JAN 3:00 pm - 4:30 pm  
**19 Meet and Greet with Construction Managers / General Contractors for upcoming Racine Unified School District (RUSD) Projects**
- JAN All day  
**24 Wisconsin Federal Contractor Forum (by invitation)**
- JAN 7:30 am - 6:00 pm  
**25 15th Annual End of Year Federal Contractor Update – (Oshkosh, WI) In-Person**

# Introduction to NIST SP 800-171r2

## Controls



CYBER FRIDAY SESSIONS – October 27th, 2023

## **NIST** **National Institute of Standards and Technology**

The Contractor shall implement NIST SP 800-171, as soon as practical, but not later than December 31, 2017.

The Contractor shall notify the prime Contractor (or next higher-tier subcontractor) when submitting a request to vary from a NIST SP 800-171 security requirement.

When the Contractor discovers a cyber incident that affects a covered contractor information system or the covered defense information residing therein, or that affects the contractor's ability to perform the requirements of the contract... the Contractor shall rapidly report cyber incidents to DoD.

# DFARS 252.204-7021

The Cybersecurity Maturity Model Certification (CMMC) is a framework that measures a contractor's cybersecurity maturity to include the implementation of cybersecurity practices...



*(b) Requirements.* The Contractor shall have a current (i.e. not older than 3 years) CMMC certificate at the CMMC level required by this contract and maintain the CMMC certificate at the required level for the duration of the contract.

# 14 Families – 110 Controls – 320 Audit Objectives

- Access Control
- Awareness and Training
- Audit and Accountability
- Configuration Management
- Identification and Authentication
- Incident Response
- Maintenance
- Media Protection
- **Personnel Security**
- **Physical Protection**
- Risk Assessment
- Security Assessment
- System and Communications Protection
- System and Information Integrity

## NIST Handbook 162

# NIST MEP Cybersecurity Self-Assessment Handbook For Assessing NIST SP 800-171 Security Requirements in Response to DFARS Cybersecurity Requirements

1

NIST Handbook 162

NIST MEP Cybersecurity Self-Assessment Handbook for Assessing NIST SP 800-171 Security Requirements in Response to DFARS Cybersecurity Requirements

2

NIST SP 800-171A

NIST Special Publication 800-171A  
Assessing Security Requirements for  
Controlled Unclassified Information

3

NIST SP 800-171r2

NIST Special Publication 800-171  
Revision 2  
Protecting Controlled Unclassified  
Information in Nonfederal Systems  
and Organizations

1



Understanding  
the Controls

2

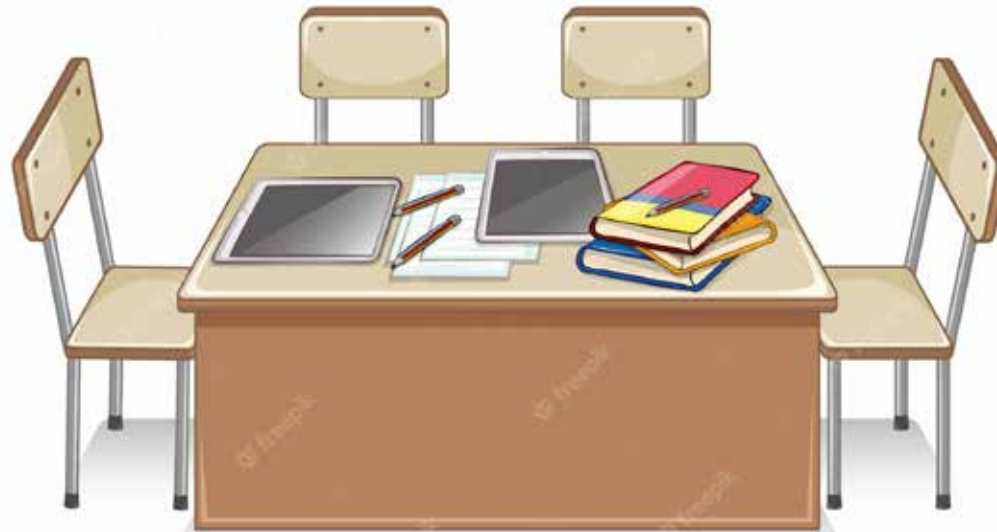


Controls &  
Objectives

3



Documentation &  
Evidence



### 3.9.1 Screen individuals prior to authorizing access to organizational systems containing CUI.

#### DISCUSSION

Personnel security screening (vetting) activities involve the evaluation/assessment of individual's conduct, integrity, judgment, loyalty, reliability, and stability (i.e., the trustworthiness of the individual) prior to authorizing access to organizational systems containing CUI. The screening activities reflect applicable federal laws, Executive Orders, directives, policies, regulations, and specific criteria established for the level of access required for assigned positions.

3.9.1	<p><b>SECURITY REQUIREMENT</b></p> <p>Screen individuals prior to authorizing access to organizational systems containing CUI.</p>
	<p><b>ASSESSMENT OBJECTIVE</b></p> <p><i>Determine if individuals are screened prior to authorizing access to organizational systems containing CUI.</i></p>
	<p><b>POTENTIAL ASSESSMENT METHODS AND OBJECTS</b></p> <p><u>Examine</u>: [SELECT FROM: Personnel security policy; procedures addressing personnel screening; records of screened personnel; system security plan; other relevant documents or records].</p> <p><u>Interview</u>: [SELECT FROM: Personnel with personnel security responsibilities; personnel with information security responsibilities].</p> <p><u>Test</u>: [SELECT FROM: Organizational processes for personnel screening].</p>

## 3.9 Personnel Security



**Due  
Dillegence**



**Provision**



**Offboard**



**Validate**

**3.10.1 Limit physical access to organizational systems, equipment, and the respective operating environments to authorized individuals.**

**DISCUSSION**

This requirement applies to employees, individuals with permanent physical access authorization credentials, and visitors. Authorized individuals have credentials that include badges, identification cards, and smart cards. Organizations determine the strength of authorization credentials needed consistent with applicable laws, directives, policies, regulations, standards, procedures, and guidelines. This requirement applies only to areas within facilities that have not been designated as publicly accessible.

Limiting physical access to equipment may include placing equipment in locked rooms or other secured areas and allowing access to authorized individuals only; and placing equipment in locations that can be monitored by organizational personnel. Computing devices, external disk drives, networking devices, monitors, printers, copiers, scanners, facsimile machines, and audio devices are examples of equipment.

3.10.1	<b>SECURITY REQUIREMENT</b> Limit physical access to organizational systems, equipment, and the respective operating environments to authorized individuals.	
	<b>ASSESSMENT OBJECTIVE</b> <i>Determine if:</i>	
	3.10.1[a]	<i>authorized individuals allowed physical access are identified.</i>
	3.10.1[b]	<i>physical access to organizational systems is limited to authorized individuals.</i>
	3.10.1[c]	<i>physical access to equipment is limited to authorized individuals.</i>
	3.10.1[d]	<i>physical access to operating environments is limited to authorized individuals.</i>
	<b>POTENTIAL ASSESSMENT METHODS AND OBJECTS</b> <p><b>Examine:</b> [SELECT FROM: Physical and environmental protection policy; procedures addressing physical access authorizations; system security plan; authorized personnel access list; authorization credentials; physical access list reviews; physical access termination records and associated documentation; other relevant documents or records].</p> <p><b>Interview:</b> [SELECT FROM: Personnel with physical access authorization responsibilities; personnel with physical access to system facility; personnel with information security responsibilities].</p> <p><b>Test:</b> [SELECT FROM: Organizational processes for physical access authorizations; mechanisms supporting or implementing physical access authorizations].</p>	

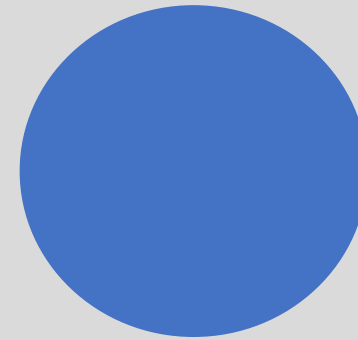
## 3.10 Physical Security



**Authorize**



**Secure**



**Restrict**



**Record**

1



Understanding  
the Controls

2

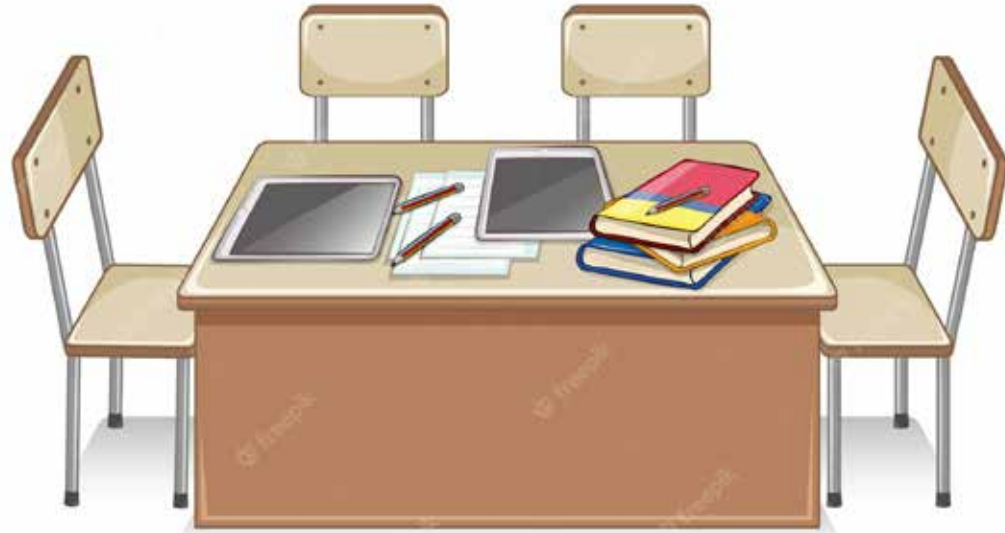


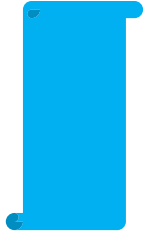
Controls &  
Objectives

3



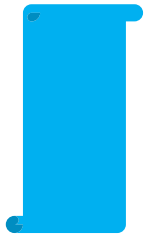
Documentation &  
Evidence





## Onboarding Process

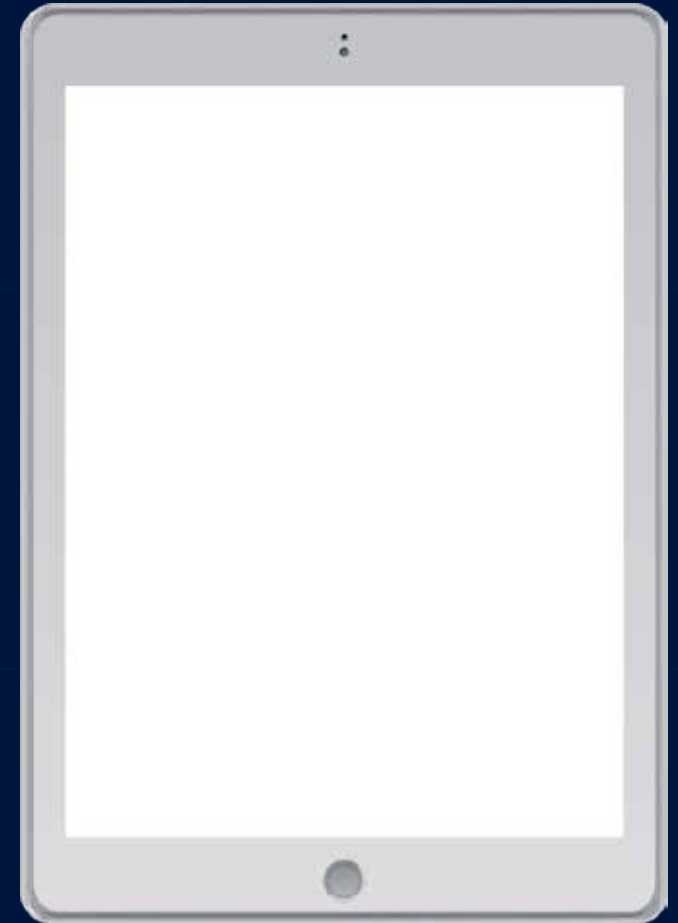
- Screen/Interview/Information Gather
- Consider Risks of Role to Company
- Follow Process/Policy
- Save Records



## Offboard Process

- Determination of Exit/Reason Clearly Stated
- Follow Process./Policy
- Remove Permissions/Access
- Save Records

# Physical Security



3.9.1	<p><b>SECURITY REQUIREMENT</b></p> <p>Screen individuals prior to authorizing access to organizational systems containing CUI.</p>
	<p><b>ASSESSMENT OBJECTIVE</b></p> <p><i>Determine if individuals are screened prior to authorizing access to organizational systems containing CUI.</i></p>
	<p><b>POTENTIAL ASSESSMENT METHODS AND OBJECTS</b></p> <p><u>Examine</u>: [SELECT FROM: Personnel security policy; procedures addressing personnel screening; records of screened personnel; system security plan; other relevant documents or records].</p> <p><u>Interview</u>: [SELECT FROM: Personnel with personnel security responsibilities; personnel with information security responsibilities].</p> <p><u>Test</u>: [SELECT FROM: Organizational processes for personnel screening].</p>

## 3.9.1 – Meeting the Controls

# ONBOARDING PROCESS

3.9.1 Determine if individuals are screened prior to authorizing access to organizational systems containing CUI.

Include forms/documentation in process that speak to risk evaluation.

Include formal authorization of employee access.

3.9.2	<b>SECURITY REQUIREMENT</b> Ensure that organizational systems containing CUI are protected during and after personnel actions such as terminations and transfers.	
<b>ASSESSMENT OBJECTIVE</b> <i>Determine if:</i>		
3.9.2[a]	<i>a policy and/or process for terminating system access and any credentials coincident with personnel actions is established.</i>	
3.9.2[b]	<i>system access and credentials are terminated consistent with personnel actions such as termination or transfer.</i>	
3.9.2[c]	<i>the system is protected during and after personnel transfer actions.</i>	
<b>POTENTIAL ASSESSMENT METHODS AND OBJECTS</b> <p><b>Examine:</b> [SELECT FROM: Personnel security policy; procedures addressing personnel transfer and termination; records of personnel transfer and termination actions; list of system accounts; records of terminated or revoked authenticators and credentials; records of exit interviews; other relevant documents or records].</p> <p><b>Interview:</b> [SELECT FROM: Personnel with personnel security responsibilities; personnel with account management responsibilities; system or network administrators; personnel with information security responsibilities].</p> <p><b>Test:</b> [SELECT FROM: Organizational processes for personnel transfer and termination; mechanisms supporting or implementing personnel transfer and termination notifications; mechanisms for disabling system access and revoking authenticators].</p>		

## 3.9.2 – Meeting the Controls

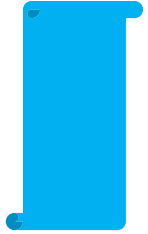
### OFFBOARDING PROCESS

3.9.2[a] A policy and/or process for terminating system access and any credentials coincident with personnel actions is established.

### VALIDATE ACCESS REMOVAL

3.9.2[b] System access and credentials are terminated consistent with personnel actions such as termination or transfer.

3.9.2[c] The system is protected during and after personnel transfer actions



## Identification and Authorization

- Users Are Authorized and Identifiable
- Records of Process are Accurate and Available
- Visitors are clearly identified



## Observe and Monitor

- Badges for Visitors
- Escorting Procedures and Briefings
- Training and Process



## Validate and Record Keeping

- Visitor Log Creation and Retention
- Training Records and Retention

# Physical Protection



3.10.1	<b>SECURITY REQUIREMENT</b> Limit physical access to organizational systems, equipment, and the respective operating environments to authorized individuals.	
	<b>ASSESSMENT OBJECTIVE</b> <i>Determine if:</i>	
	3.10.1[a]	<i>authorized individuals allowed physical access are identified.</i>
	3.10.1[b]	<i>physical access to organizational systems is limited to authorized individuals.</i>
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## 3.10.1 – Meeting the Controls

ONBOARDING

3.10.1[a] authorized individuals allowed physical access are identified.

VISITOR SIGN IN

ENTRY  
CONTROL

3.10.1[b] physical access to organizational systems is limited to authorized individuals.

3.10.1[c] physical access to equipment is limited to authorized individuals.

3.10.1[d] physical access to operating environments is limited to authorized individuals.

ESCORT POLICY

3.10.2	<b>SECURITY REQUIREMENT</b> Protect and monitor the physical facility and support infrastructure for organizational systems.	
	<b>ASSESSMENT OBJECTIVE</b> <i>Determine if:</i>	
	3.10.2[a]	<i>the physical facility where organizational systems reside is protected.</i>
	3.10.2[b]	<i>the support infrastructure for organizational systems is protected.</i>
	3.10.2[c]	<i>the physical facility where organizational systems reside is monitored.</i>
	3.10.2[d]	<i>the support infrastructure for organizational systems is monitored.</i>
	<b>POTENTIAL ASSESSMENT METHODS AND OBJECTS</b> <p><b>Examine:</b> [SELECT FROM: Physical and environmental protection policy; procedures addressing physical access monitoring; system security plan; physical access logs or records; physical access monitoring records; physical access log reviews; other relevant documents or records].</p> <p><b>Interview:</b> [SELECT FROM: Personnel with physical access monitoring responsibilities; personnel with incident response responsibilities; personnel with information security responsibilities].</p> <p><b>Test:</b> [SELECT FROM: Organizational processes for monitoring physical access; mechanisms supporting or implementing physical access monitoring; mechanisms supporting or implementing the review of physical access logs].</p>	

## 3.10.2 – Meeting the Controls

### SECURITY POLICY

3.10.2[a] the physical facility where organizational systems reside is protected.

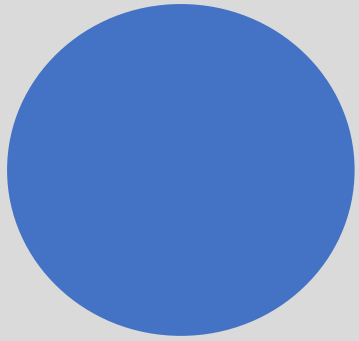
3.10.2[b] the support infrastructure for organizational systems is protected.

### ESCORT & SECURITY POLICY

3.10.2[c] the physical facility where organizational systems reside is monitored.

3.10.2[d] the support infrastructure for organizational systems is monitored.

## 3.10 Physical Security Policy Highlights



**Visitor  
Logging/  
Escorting**



**Security  
Features**



**Security  
Processes**



**Records  
And  
Training**

1



Understanding  
the Controls

2



Controls &  
Objectives



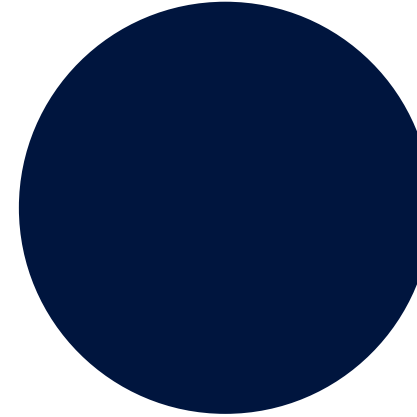
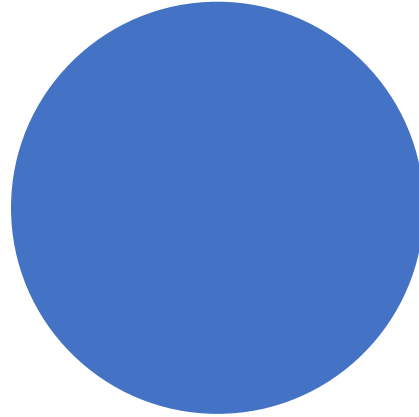
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Documentation &  
Evidence

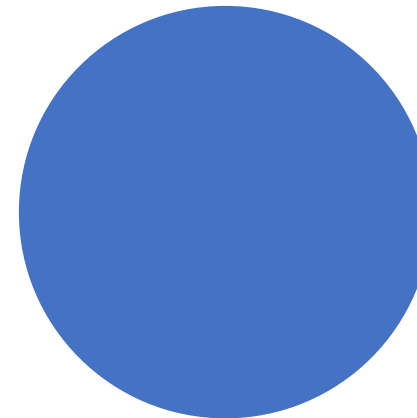
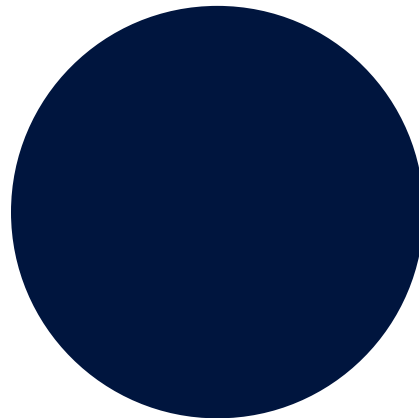
# System Security Plan

**Control Owners**  
are clearly defined.



**Technical Control Artifacts**  
are collected, accurate, and  
available.

**Processes**  
are documented and  
approved.



**Reviews**  
are periodically conducted,  
tracked, and summarized.

Matthew Frost

[mattf@wispro.org](mailto:mattf@wispro.org)

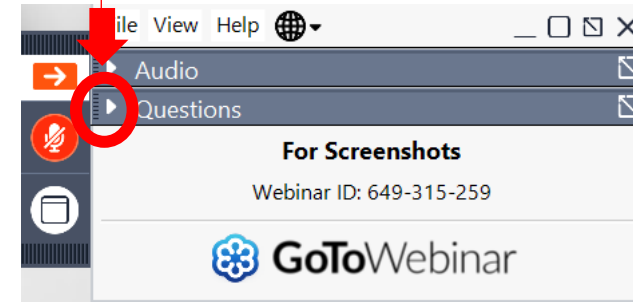


# QUESTIONS?



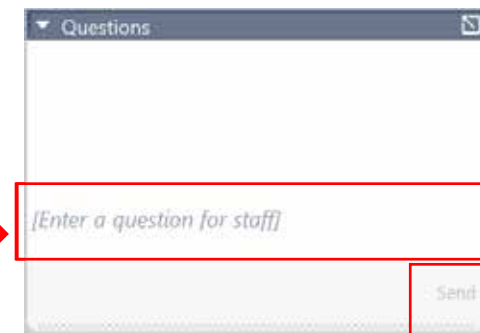
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# UPCOMING TRAINING - EVENTS

# GOVERNMENT CERTIFICATION WORKSHOPS

- October 12  
**Federal Certifications**
- October 26  
**Local Certifications**
- November 30  
**State Certifications**



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- October 27  
**NIST SP 800.171 – 3.9 Personnel Security and 3.10 Physical Protection**
- November 3  
**NIST SP 800.171 – 3.11 Risk Assessment and 3.12 Security Assessment**
- November 9 (Thursday)  
**NIST SP 800.171 – 3.13 System and Communications Protection and 3.14 System and Information Integrity**

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October 27, 2023

# SURVEY



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