

| Policy Title | Standard # | Standard Title | Target Audience | Applicability | Relative Control Weighting (1-10) | SCF # | Secure Controls Framework (SCF) Control Description | AJCPA SOC 2 (2016) | AJCPA SOC 2 (2017) | OS CSC v6.1 | OS CSC v7 (draft) | COBIT V5 | CSO v2013 | CSA CSM v3.0.1 | EMISA v2.0 | GAPP | ISO 27001 v2013 | ISO 27002 v2013 | NIST 800-53 rev4 | NIST 800-160 | NIST 800-171 rev 1 | NIST CSF | OWASP Top 10 v2017 | PCI DSS v2.2 | US FERPA | US FFEC | US FINRA | US GLBA | US HIPAA | US Privacy Shield | US - MA 201 CMR 17.00 | US - NY DFS 23 NYCRR500 | US - OR 646A | US - TX BC21 | US - TX Cybersecurity Act | EMEA EU GDPR | |
|---|------------|--|-----------------|---------------|-----------------------------------|--------|---|--------------------|--------------------|-------------|--|--|--|----------------------------------|--------------|-------|-----------------|-----------------|--|---------------------------------|--------------------|--------------------------------------|--|----------------------------|--|---|---|--|--|--|-------------------------------------|-------------------------|------------------|--|---------------------------|--|--|
| Security & Privacy Governance | GOV-1 | Publishing Security Policies | Management | Basic | 10 | GOV-02 | Mechanisms exist to establish, maintain and disseminate cybersecurity and privacy policies, standards and procedures. | | | | | AP013.01 AP013.02 | Principle 12 | AS-04 GRM-05 GRM-06 | S01 | 8.2.1 | 5.2 | 5.1.1 | PM-1 | | | ID.GV-1 | | 12.1 12.1.1 | § 1232h | D1.G.SP.B.4 | S-P (17 CFR §248.30) | 6801(b)(1) | 164.308(a)(1)(i)(I) 164.316 | | 17.09(1) 17.04 17.09(2)(b)(2) | 500.03 | | | Sec 10 | Art 32.1 Art 32.2 Art 32.3 Art 32.4 | |
| Security & Privacy Governance | GOV-2 | Assigned Security Responsibilities | Management | Basic | 10 | GOV-04 | Mechanisms exist to assign a qualified individual with the mission and resources to centrally manage coordinate, develop, implement and maintain an enterprise-wide cybersecurity and privacy program. | CC1.1 | CC1.1 | | | AP001.06 | Principle 2 | GRM-05 | | 8.2.7 | 5.3 | | PL-9 PM-2 PM-6 | | | ID.AM-6 | | 12.5-12.5.5 | D1.R.SP.B.1 D1.TC.Cu.B.1 | Safeguards Rule | | 164.308(a)(2) 164.308(a)(3) 164.308(a)(4) 164.308(a)(5) 164.314 | | 17.03(2)(a) | 500.04 | 62212(d)(4)(A)(i) | | Sec 9 | | | |
| Security & Privacy Governance | GOV-3 | Measures of Performance | Management | Basic | 6 | GOV-05 | Mechanisms exist to develop, report and monitor cybersecurity and privacy program measures of performance. | | | | | EDM02.03 AP001.06 EDM05.02 EDM05.03 MEAD1.01 MEAD1.02 | Principle 5 Principle 9 Principle 13 Principle 14 Principle 15 | S011 S12 S13 S14 S15 | | | | 3.3.7 3.3.8 | PM-6 | 3.3.7 3.3.8 | PR.IP-8 | | | D2.IS.N.B.1 D2.IS.R.E.2 | | 164.308(a)(6)(i)(I) 164.308(a)(8) | | 17.03(2)(j) | | 62212(d)(4)(A)(i) 62212(d)(8)(i)(I) | | Sec 10 Sec 11 | | | | | |
| Asset Management | AST-1 | Asset Inventories | Management | Basic | 10 | AST-02 | Mechanisms exist to inventory system components that: • Accurately reflects the current system; • Is at the level of granularity deemed necessary for tracking and reporting; • Includes organization-defined information deemed | | | 1.4 | 1.6 2.1 2.5 12.9 16.12 | BAI09.01 BAI09.05 | | S015 | | | | | 8.1.1 | CM-8 PM-5 | 3.4.1 3.4.2 | ID.AM-1 ID.AM-2 ID.AM-4 | | 1.1.2 2.2.4 | D1.G.IT.B.1 D4.RM.DS.B.2 D4.C.Co.B.3 | | 164.308(a)(1)(ii)(A) 164.308(a)(4)(ii)(A) 164.308(a)(7)(i)(E) 164.308(b) 164.310(b) 164.310(d)(2)(iii) | | | | | | | Art 30.1 Art 30.2 Art 30.3 Art 30.5 | | | |
| Asset Management | AST-2 | Network Diagrams & Data Flow Diagrams (DFDs) | Technical | Basic | 10 | 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 state of the network environment; and | | | | 12.9 16.12 | | IVS-13 | | | | | | SA-5(i) SA-5(j) SA-5(k) SA-5(l) | | | ID.AM-3 | | 1.1.2 1.1.3 | D4.C.Co.B.4 D4.C.Co.H.1 | | 164.308(a)(1)(ii)(A) 164.308(a)(3)(ii)(A) 164.308(a)(8) 164.310(b) | | | | | | | | | Art 30.1 Art 30.2 Art 30.3 Art 30.5 | |
| Asset Management | AST-3 | Removal of Assets | All Users | Basic | 8 | AST-11 | Mechanisms exist to authorize, control and track systems entering and exiting organizational facilities. | | | | | | DCS-04 | | | | | | | | | PR.DS-3 | | | D1.G.IT.B.3 D1.G.IT.E.2 | | 164.308(a)(1)(ii)(A) 164.310(a)(2)(i) 164.310(a)(2)(ii)(H) 164.310(d)(1) 164.310(d)(2) 164.308(a)(7) 164.308(a)(7)(i) 164.308(a)(7)(ii)(C) 164.310(a)(2)(i) 164.312(a)(2)(i) | | | 62212(d)(4)(C)(i) | | | | | | | |
| Business Continuity & Disaster Recovery | BCD-1 | Contingency Plan | Management | Basic | 10 | BCD-01 | Mechanisms exist to facilitate the implementation of contingency planning controls. | A1.3 | A1.3 | | | DS504.01 DS504.02 DS504.03 | | BCR-01 BCR-07 | S019 S020 | | | | 17.1.2 | CP-1 CP-2 IR-4(i) PM-8 | | RCR.P-1 | | | D5.IR.PI.B.6 | | 164.308(a)(7)(i)(D) 164.308(a)(8) 164.310(a)(2)(i) 164.312(a)(2)(i) | | | | | | | Art 32.1 Art 32.2 | | | |
| Business Continuity & Disaster Recovery | BCD-2 | Contingency Plan Root Cause Analysis (RCA) & Lessons Learned | Management | Basic | 9 | BCD-05 | Mechanisms exist to conduct a Root Cause Analysis (RCA) and "lessons learned" activity every time the contingency plan is activated. | | | | | DS504.05 DS504.08 | | S020 S022 | | | | | | | CP-4 | | RCM-1 | | | D5.IR.PI.H.4 | | 164.308(a)(7)(ii)(D) 164.308(a)(8) 164.310(a)(2)(i) | | | | | | | | | |
| Business Continuity & Disaster Recovery | BCD-3 | Contingency Plan Update | Management | Basic | 10 | BCD-06 | Mechanisms exist to keep contingency plans current with business needs and technology changes. | | | | | DS504.08 | | S019 S020 | | | | | | | | RCM-2 | | | D5.IR.PI.H.4 D5.IR.Te.H.5 | | 164.308(a)(7)(ii)(D) 164.308(a)(8) | | | | | | | | | | |
| Business Continuity & Disaster Recovery | BCD-4 | Data Backups | Technical | Basic | 10 | BCD-11 | Mechanisms exist to create recurring backups of data, software and system images to ensure the availability of the data. | | | 10.1 | 10.1 | DS504.07 | | | | | | | | | 12.3.1 | CP-9 SC-28(2) | | | | | | 164.308(a)(7)(iii)(A) 164.308(a)(7)(iii)(B) 164.308(a)(7)(iii)(D) 164.310(a)(2)(i) 164.310(d)(2)(iv) | | | | | | | | | |
| Business Continuity & Disaster Recovery | BCD-5 | Information System Recovery & Reconstitution | Technical | Basic | 10 | BCD-12 | Mechanisms exist to ensure the recovery and reconstitution of systems to a known state after a disruption, compromise or failure. | | | | 10.5 | | | | | | | | | | | CP-10 | | PR.IP-4 | | D5.IR.PI.B.5 D5.IR.Te.E.3 | | 164.308(a)(7)(iii)(B) | | | | | | | | | |
| Capacity & Performance Planning | CAP-1 | Capacity & Performance Management | Management | Basic | 8 | CAP-01 | Mechanisms exist to facilitate the implementation of capacity management controls to ensure optimal system performance for future capacity requirements. | A1.1 | A1.1 | | | | IVS-04 | | | | | | | | 12.1.3 | SC-5 SC-5(i) | | PR.DS-4 | | D5.IR.PI.B.5 D5.IR.PI.B.6 D5.IR.PI.E.3 D3.PC.Im.E.4 | | 164.308(a)(1)(ii)(A) 164.308(a)(1)(ii)(B) 164.308(a)(7) 164.310(a)(2)(i) 164.310(d)(2)(iv) 164.312(a)(2)(iii) | | | | | | | Art 32.1 Art 32.2 | | |
| Change Management | CHG-1 | Configuration Change Control | All Users | Basic | 10 | CHG-02 | Mechanisms exist to govern the technical configuration change control processes. | | | | | | MDS-15 | S014 | | | | | | | 14.2.2 | CM-3 | 3.4.10 3.4.13 | 3.4.3 | PR.IP-3 | | D1.G.IT.B.4 | | | | | | | | | | |
| Compliance | CPL-1 | Statutory, Regulatory & Contractual Compliance | All Users | Basic | 10 | CPL-01 | Mechanisms exist to facilitate the implementation of relevant legislative, statutory, regulatory and contractual controls. | | | | | MEAD3.01 MEAD3.02 | | S025 | | | | | | | 18.1.1 | PM-8 | 3.3 3.3.3 3.4 3.4 3.4.1 3.4.2 | | ID.GV-3 PR.IP-5 | | D1.G.Ov.E.2 D3.PC.Am.B.11 | 6801(b)(3) | 164.306 164.308 164.308(a)(7)(i)(C) 164.308(a)(8) 164.310 | | 500.19 | | | | | Art 1.2 Art 2.1 Art 2.2 Art 3.1 Art 3.2 Art 3.3 | |
| Compliance | CPL-2 | Security Controls Oversight | Management | Basic | 10 | CPL-02 | Mechanisms exist to provide a security controls oversight function. | | | | | AP001.03 DS501.04 DS506.04 MEAD2.01 MEAD2.02 | | AAC-02 AAC-03 | S025 | | 8.2.7 | 9.3 | | CA-7 CA-7(i) PM-14 | 3.3.8 | 3.12.1 3.12.2 3.12.3 3.12.4 | DE.DP-5 PR.IP-7 | | 12.11 12.11.1 | D5.IR.PI.H.3 D1.RM.RMP.E.2 D3.G.Ov.A.2 | | 164.306(f) 164.308(a)(7)(ii)(D) 164.308(a)(8) 164.310(d)(2)(ii)(H) | | | 62212(b)(ii) | | Sec 10 Sec 11 | Art 5.2 | | | |
| Configuration Management | CFG-1 | System Hardening Through Baseline Configurations | Technical | Basic | 10 | CFG-02 | Mechanisms exist to develop, document and maintain secure baseline configurations for technology platform that are consistent with industry-accepted system hardening standards. | | | 3.1 | 5.1 5.2 5.3 5.5 6.2 8.3 | BA101.02 | | GRM-01 IVS-07 | | | | 14.1.1 | CM-2 CM-6 SA-8 | 3.4.7 3.4.8 | 3.4.1 3.4.2 | PR.IP-1 PR.IP-3 | | 1.1 1.1.1 2.2-2.2.4 | D3.PC.Im.B.5 D1.G.IT.B.4 | | 164.308(a)(8) 164.308(a)(7)(i) 164.308(a)(7)(i)(I) | | | | | | | | | | |
| Configuration Management | CFG-2 | Least Functionality | Technical | Basic | 10 | 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. | | | 9.1 | 9.1 9.5 15.7 15.8 | | IAC-03 | | | | | | | | | CM-7 | | 3.4.6 | PR.PT-3 | A6 | 1.1.5 2.2.1 2.2.2 2.2.4 2.2.5 | D3.PC.Am.B.7 D3.PC.Am.B.4 D3.PC.Am.B.3 D4.RM.Om.H.1 | 164.308(a)(3) 164.308(a)(4) 164.310(a)(2)(ii)(H) 164.310(b) 164.310(c) | | 17.03(2)(a) 17.03(2)(g) | | | | | | |
| Monitoring | MON-1 | Continuous Monitoring | Technical | Basic | 10 | MON-01 | Mechanisms exist to facilitate the implementation of enterprise-wide monitoring controls. | | | 4.6 | 6.2 14.7 | DS501.03 DS505.07 | | IVS-06 | S021 | | | | 12.4.1 | AU-1 SI-4 | | NFO | DE.CM-1 DE.DP-1 DE.DP-2 PR.PT-1 | A2 A5 | 10.1 10.6-10.6.3 10.8-10.8.1 | D3.DC.Am.B.3 D1.G.SP.B.3 D3.MA.Ma.B.1 D3.MA.Ma.B.2 D3.DC.Fv.B.4 | 164.308(a)(1)(ii)(I) 164.308(a)(1)(ii)(II) 164.308(a)(3)(ii)(H) 164.308(a)(5)(ii)(H) 164.308(a)(5)(iii)(C) 164.308(a)(12) 164.308(a)(13)(ii)(A) | | | 500.06 | | | | Art 32.1 Art 32.2 | | | |
| Monitoring | MON-2 | Monitoring Reporting | Technical | Basic | 7 | MON-06 | Mechanisms exist to provide an event log report generation capability to aid in detecting and assessing anomalous activities. | | | 6.4 | | | | | | | | | | | | AU-7 AU-7(i) AU-12 | 3.3.1 3.3.2 3.3.6 | DE.DP-4 | | D3.DC.Fv.B.2 D5.IR.I.B.1 D5.IR.I.E.1 | | 164.308(a)(6)(ii)(I) 164.314(a)(2)(ii)(C) 164.314(a)(2)(ii)(H) | | | | | | | | | |
| Monitoring | MON-3 | Anomalous Behavior | Technical | Basic | 10 | MON-16 | Mechanisms exist to detect and respond to anomalous behavior that could indicate account compromise or other malicious activities. | | | 16.10 | 16.8 | | | SI-4(i1) | | | | | | | | | DE.AE-1 | | 10.6-10.6.2 | D1.DC.Fv.B.1 D4.C.Co.B.4 | | 164.308(a)(1)(ii)(D) 164.312(b) | | | | | | | | | |

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|---------------------------------|------------|--|-----------------|---------------|-----------------------------------|----------|---|--------------------|--------------------|-------------|-----------------------|--|-----------|------------------|--------------|-------|-----------------|-------------------|------------------------------|--|--|----------|--------------------|--------------|----------|---------|----------|---------|----------|-------------------|-----------------------|--------------------------|--------------|---------------|---------------------------|--------------|--|--|---------|----------------------|
| Monitoring | MDN-4 | Insider Threats | Technical | Enhanced | 8 | MDN-16.1 | Mechanisms exist to monitor internal personnel activity for potential security incidents. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Monitoring | MDN-5 | Third-Party Threats | Technical | Enhanced | 8 | MDN-16.2 | Mechanisms exist to monitor third-party personnel activity for potential security incidents. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Monitoring | MDN-6 | Unauthorized Activities | Technical | Enhanced | 8 | MDN-16.3 | Mechanisms exist to monitor for unauthorized activities, accounts, connections, devices, and software. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cryptographic Protections | CRY-1 | Transmission Confidentiality | Technical | Basic | 10 | CRY-03 | Cryptographic mechanisms are utilized to protect the confidentiality of data being transmitted. | | C1.3 | | 11.4 11.2 14.2 | | | | | 8.2.5 | | 13.2.3 | SC-8 SC-9 | | | | | | | | | | | | | | | | | | | | Art 5.1 | |
| Cryptographic Protections | CRY-2 | Transmission Integrity | Technical | Basic | 10 | CRY-04 | Cryptographic mechanisms are utilized to protect the integrity of data being transmitted. | | | | 14.2 | | | | | | | 14.1.3 | SC-8 SC-10(1) SC-28(1) | | 3.8.8 3.13.8 3.13.16 | | | | | | | | | | | | | | | | | | | Art 5.1 |
| Cryptographic Protections | CRY-3 | Encrypting Data At Rest | All Users | Basic | 10 | CRY-05 | Cryptographic mechanisms are utilized on systems to prevent unauthorized disclosure of information at rest. | | | 14.5 | 13.2 13.10 14.5 | | | | | | 10.1.1 | SC-13 SC-28(2) | | | | | | | | | | | | | | | | | | | | | | Art 5.1 |
| Data Classification & Handling | DCH-1 | Data & Asset Classification | All Users | Basic | 10 | DCH-02 | Mechanisms exist to ensure data and assets are categorized in accordance with applicable statutory, regulatory and contractual requirements. | | | 13.1 | 13.1 | BA08.03 | | | | | | | | DS-01 DC-01 | | | | 9.6.1 | | | | | | | | | | | | | | | | |
| Data Classification & Handling | DCH-2 | Physical Media Disposal | All Users | Basic | 10 | DCH-08 | Mechanisms exist to securely dispose of media when it is no longer required, using formal procedures. | C1.8 | C1.8 | | | | | | | | | 8.2.1 | | | | | | | | | | | | | | | | | | | | | | |
| Data Classification & Handling | DCH-3 | Removable Media Security | All Users | Basic | 10 | DCH-12 | Mechanisms exist to restrict removable media in accordance with data handling and acceptable usage parameters. | | | | 13.4 | | | | | | | 8.3.1 | | | | | | | | | | | | | | | | | | | | | | |
| Endpoint Security | END-1 | Malicious Code Protection (Anti-Malware) | All Users | Basic | 10 | END-04 | Mechanisms exist to utilize anti-malware technologies to detect and eradicate malicious code. | CCS.8 | CCS.8 | 8.1 | 8.1 8.6 8.8 | DS05.01 | | TVM-01 | S012 | | | | | | 3.14.1 3.14.2 3.14.3 3.14.4 3.14.5 | | | | | | | | | | | | | | | | | | | |
| Endpoint Security | END-2 | File Integrity Monitoring (FIM) | Technical | Enhanced | 8 | END-06 | Mechanisms exist to utilize File Integrity Monitor (FIM) technology to detect and report unauthorized changes to system files and configurations. | | | 3.5 | | | | | S012 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Endpoint Security | END-3 | Mobile Code | Technical | Basic | 4 | END-10 | Mechanisms exist to address mobile code / operating system independent applications. | | | | | | | TVM-03 | | | | | | SC-18 SC-18(1) SC-18(2) SC-18(3) SC-18(4) SC-27 | | | | | | | | | | | | | | | | | | | | |
| Human Resources Security | HRS-1 | Human Resources Security Management | All Users | Basic | 10 | HRS-01 | Mechanisms exist to facilitate the implementation of personnel security controls. | | | | | AP004.01 | | | S07 S08 | | | | | | | | | | | | | | | | | | | | | | | | | Art 32.1 Art 32.2 |
| Identification & Authentication | IAC-1 | User Provisioning & De-Provisioning | All Users | Basic | 10 | IAC-07 | Mechanisms exist to utilize a formal user registration and de-registration process that governs the assignment of access rights. | CCS.2 | CCS.2 | | 16.3 | | | IAC-09 IAC-11 | S07 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Identification & Authentication | IAC-2 | Account Management | All Users | Basic | 10 | IAC-15 | Mechanisms exist to proactively govern account management of individual, group, system, application, guest and temporary accounts. | | | | 16.1 16.4 16.13 | | | IAC-10 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Identification & Authentication | IAC-3 | Least Privilege | All Users | Basic | 10 | 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. | CCS.6 | CCS.6 | | 14.4 | | | S011 | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-1 | Management of Security Incidents | Management | Basic | 10 | IRO-01 | Mechanisms exist to facilitate the implementation of incident response controls. | | | | | | | | S016 S018 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-2 | Incident Handling | All Users | Basic | 10 | IRO-02 | Incident handling mechanisms exist to cover preparation, detection and analysis, containment, eradication and recovery. | | | | | DS02.03 DS02.04 DS02.05 DS02.06 DS03.01 DS03.02 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-3 | Indicators of Compromise (IOC) | Technical | Basic | 8 | IRO-03 | Mechanisms exist to define specific Indicators of Compromise (IOC) that identify the potential impact of likely cybersecurity events. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-4 | Incident Response Plan (IRP) | Technical | Basic | 8 | IRO-04.2 | Mechanisms exist to regularly update incident response strategies to keep current with business needs, technology changes and regulatory requirements. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|-----------------------------------|------------|---|-----------------|---------------|-----------------------------------|----------|--|-------------------|-------------------|--------------|-------------------|--|-----------|------------------------------|----------------------------|-------|-----------------|-------------------|------------------|--------------|--------------------|----------------------------|--------------------|--------------|----------|----------|----------|---------|----------|-------------------|-----------------------|-------------------------|--------------|--------------|---------------------------|--------------|--|--|--|-----------|-----------------|
| Incident Response | IRO-5 | Coordination with Related Plans | Technical | Enhanced | 7 | IRO-06.1 | Mechanisms exist to coordinate incident response testing with organizational elements responsible for related plans. | | | | | | | | | 1.2.7 | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-6 | Integrated Security Incident Response Team (ISIRT) | Technical | Basic | 10 | IRO-07 | Mechanisms exist to establish an integrated team of cybersecurity, IT and business function representatives that are capable of addressing cybersecurity and privacy incident response operations. | | | | | DS02.05 | | | SO16 | | | | | | IR-10 | | | | | | | | | | | | | | | | | | Art 34.1 Art 34.2 Art 34.3 Art 34.4 | | |
| Incident Response | IRO-7 | Chain of Custody & Forensics | Technical | Basic | 10 | IRO-08 | Mechanisms exist to perform digital forensics and maintain the integrity of the chain of custody. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-8 | Incident Monitoring & Tracking | Technical | Basic | 8 | IRO-09 | Mechanisms exist to document, monitor and report cybersecurity and privacy incidents. | | | | | | | SEF-05 | SO17 | | 1.2.7 | | | | | IR-5 | | | | | | | | | | | | | | | | | | | |
| Incident Response | IRO-9 | Incident Reporting | All Users | Basic | 9 | IRO-10 | Mechanisms exist to report incidents: + Internally to organizational incident response personnel within organization defined time-periods; and + Externally to regulatory authorities and affected parties, as necessary. | CC2.5 | CC2.5 | 19.4 19.6 | | DS02.07 DS03.03 | | | SO18 | | 1.2.7 | | | | IR-6 | | | | | | | | | | | | | | | | | | Art 33.1 Art 33.2 Art 33.3 Art 33.4 Art 33.5 Art 34.1 | | |
| Incident Response | IRO-10 | Root Cause Analysis (RCA) & Lessons Learned | Technical | Basic | 10 | IRO-13 | Mechanisms exist to incorporate lessons learned from analyzing and resolving cybersecurity and privacy incidents to reduce the likelihood or impact of future incidents. | | | | | | DS03.04 | | SO18 | | | | | | | IR-1 | | | | | | | | | | | | | | | | | | | |
| Maintenance | MNT-1 | Controlled Maintenance | All Users | Basic | 10 | MNT-02 | Mechanisms exist to conduct controlled maintenance activities throughout the lifecycle of the system, application or service. | | | | | | | | | | | | | | | MA-2 | | | | | | | | | | | | | | | | | | | |
| Maintenance | MNT-2 | Non-Local Maintenance | Technical | Basic | 10 | MNT-05 | Mechanisms exist to authorize, monitor and control non-local maintenance and diagnostic activities. | | | | | | | | | | | | | | | | MA-4 | | | | | | | | | | | | | | | | | | |
| Network Security | NET-1 | Network Security Management | All Users | Basic | 10 | NET-01 | Mechanisms exist to develop, govern & update procedures to facilitate the implementation of network security controls. | | | | | 11.1 11.2 | DS05.02 | | | | | | | | | SC-1 | | | | | | | | | | | | | | | | | Art 32.1 Art 32.2 | | |
| Network Security | NET-2 | Layered Network Defenses | Technical | Basic | 9 | NET-02 | Mechanisms exist to implement security functions as a layered structure that minimize interactions between layers of the design and avoiding any dependency by lower layers on the functionality or correctness of higher layers. | | | 9.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Network Security | NET-3 | Remote Access | All Users | Basic | 10 | NET-14 | Mechanisms exist to define, control and review remote access methods. | | | 12.7 | 12.6 12.7 | | | | | | 6.2.2 | AC-17 AC-17(b) | | | | 3.1.1 3.1.2 | | | | | | | | | | | | | | | | | | | |
| Physical & Environmental Security | PES-1 | Physical Access Control | All Users | Basic | 10 | PES-03 | Physical access control mechanisms exist to enforce physical access authorizations for all physical access points (including designated entry/exit points) to facilities (including those areas within the facility officially designated as publicly accessible). | | | | | DS05.05 DS05.06 | | DCS-02 | SO9 | | | | | | | PE-3 PE-3(2) PE-3(3) | | | | | | | | | | | | | | | | | | 17.032(g) | 622(2)(d)(C)(i) |
| Physical & Environmental Security | PES-2 | Monitoring Physical Access | Management | Basic | 10 | PES-05 | Physical access control mechanisms exist to monitor for, detect and respond to physical security incidents. | | | | | DS05.07 | | | SO9 | | | | | | | PE-6 | | | | | | | | | | | | | | | | | 622(2)(d)(C)(i) | | |
| Physical & Environmental Security | PES-3 | Information Leakage Due To Electromagnetic Signals Emanations | | | 5 | PES-13 | Facility security mechanisms exist to protect the system from information leakage due to electromagnetic signals emanations. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Project & Resource Management | PRM-1 | Allocation of Resources | Management | Basic | 10 | PRM-03 | Mechanisms exist to identify and allocate resources for management, operational, technical and privacy requirements within business process planning for projects / initiatives. | | | | | BA05.04 APO07.01 | | | | | | | | | | SA-2 | | | | | | | | | | | | | | | | | | Sec 12 | |
| Project & Resource Management | PRM-2 | Security Requirements Definition | Management | Basic | 10 | PRM-05 | Mechanisms exist to identify critical system components and functions by performing a critically analysis for critical systems, system components or services at pre-defined decision points in the System Development Lifecycle (SDLC). | CC2.2 | CC2.2 | | | DS06.01 | | Principle 10 Principle 11 | | | | | | | | SA-14 | | | | | | | | | | | | | | | | | | Sec 12 | |
| Project & Resource Management | PRM-3 | System Development Life Cycle (SDLC) Management | Management | Basic | 10 | PRM-07 | Mechanisms exist to ensure changes to systems within the System Development Lifecycle (SDLC) are controlled through formal change control procedures. | | | | | AP04.05 BA01.02 BA01.03 BA01.04 BA01.05 BA01.06 | | Principle 2 | | | | | | | | SA-3 | | | | | | | | | | | | | | | | | | Sec 12 | |
| Risk Management | RSK-1 | Risk Management Program | All Users | Basic | 10 | RSK-01 | Mechanisms exist to facilitate the implementation of risk management controls. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Risk Management | RSK-2 | Risk Identification | All Users | Basic | 10 | RSK-03 | Mechanisms exist to identify and document risks, both internal and external. | | | | 3.5 | | | Principle 7 | | | | | | | | | | | | | | | | | | | | | | | | | | Sec 7 | |
| Risk Management | RSK-3 | Risk Assessment | All Users | Basic | 10 | RSK-04 | Mechanisms exist to conduct an annual assessment 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. | | | 3.5 | | DS06.04 | | Principle 7 Principle 8 | BCR-05 GRM-02 GRM-10 | SO2 | 1.2.4 | 8.2 | 11.1.4 | | | RA-3 | | | | | | | | | | | | | | | | | Art 35.1 Art 35.2 Art 35.3 Art 35.6 Art 35.8 Art 35.9 | | |

| Policy Title | Standard # | Standard Title | Target Audience | Applicability | Relative Control Weighting (1-10) | SCF # | Secure Controls Framework (SCF) Control Description | ANIPA SOC 2 (2016) | ANIPA SOC 2 (2017) | OS CSC v6.1 | OS CSC v7 (draft) | COBIT V5 | CSO v2013 | CSA CCM v3.0.1 | EMISA v2.0 | GAPP | ISO 27001 v2013 | ISO 27002 v2013 | NIST 800-53 rev4 | NIST 800-160 | NIST 800-171 rev 1 | NIST CSF | OWASP Top 10 v2017 | PCI DSS v3.2 | US FERPA | US FFEC | US FINRA | US GLBA | US HIPAA | US Privacy Shield | US - MA 201 CMR 17.00 | US - NY DFS 23 NYCRR500 | US - OR 646A | US - TX BC211 | US - TX Cybersecurity Act | EMEA E4 GDPR | | | | | |
|--------------------------------------|------------|---|-----------------|---------------|-----------------------------------|----------|---|--------------------|--------------------|----------------------|----------------------------------|--------------------|------------------------------|----------------------------|------------|------|----------------------------------|-----------------|--|--------------------------|-------------------------|----------|--------------------|--------------|----------|---------|----------|---------|----------|-------------------|-----------------------|-------------------------|--------------|---------------|---------------------------|--------------|-------------|--|--|----------------------------------|--|
| Risk Management | RSK-4 | Risk Remediation | All Users | Basic | ID | RSK-06 | Mechanisms exist to remediate risks to an acceptable level. | | | | | | Principle 9 | GRM-11 | | | 8.3 10.1 | | | | | | | | | | | | | | | | | | | | | | | | |
| Risk Management | RSK-5 | Business Impact Analysis (BIA) | All Users | Basic | ID | RSK-08 | Mechanisms exist to conduct a Business Impact Analysis (BIA). | | | | | BA01.10 BA02.03 | Principle 7 Principle 8 | BCR-08 BCR-09 | | | 8.2 | | | | | | | | | | | | | | | | | | | | | Art 35.1 Art 35.2 Art 35.3 Art 35.6 Art 35.8 Art 35.9 | | | |
| Secure Engineering & Architecture | SEA-1 | Secure Engineering Principles | All Users | Basic | ID | SEA-01 | Mechanisms exist to facilitate the implementation of industry recognized security and privacy practices in the specification, design, development, implementation and modification of systems and services. | CC3.2 | CC3.2 | | | DS06.06 | Principle 10 Principle 11 | SO12 | | | 4.2.3 6.2.2 7.2.2 7.2.3 | 14.2.5 | AR-7 SA-8 SA-13 SC-7(I&S) SI-1 | 2.1 2.2 2.3 2.4 | 3.13.1 3.13.2 NFO | PR-IP-1 | A5 A6 | 2.2 | | | | | | | | | | | | | Principle 4 | | | Sec 521.052 | Art 24.1 Art 24.2 Art 24.3 Art 25.1 Art 26.2 |
| Secure Engineering & Architecture | SEA-2 | Fail Secure | Technical | Enhanced | 8 | SEA-07.2 | Mechanisms exist to enable systems to fail to an organization-defined known state for types of failures, preserving system state information in failure. | | | | | | | | | | | | CP-12 SC-24 | | | | | | | | | | | | | | | | | | | | | | |
| Security Awareness & Training | SAT-1 | Security & Privacy-Minded Workforce | All Users | Basic | ID | SAT-01 | Mechanisms exist to facilitate the implementation of security workforce development and awareness controls. | | | | | BA08.04 BA08.05 | | HRS-09 | SO6 | | | | | | | | | | | | | | | | | | | | | | | | Art 32.1 Art 32.2 Art 32.4 | | |
| Security Awareness & Training | SAT-2 | Security & Privacy Training | All Users | Basic | ID | SAT-03 | Mechanisms exist to provide role-based security-related training: • Before authorizing access to the system or performing assigned duties; • When required by system changes; and • Annually thereafter. Mechanisms exist to provide specific training for privileged users to ensure privileged users understand their unique roles and responsibilities | | | 17.2 | | | | | SO6 | | | | | | AT-1 PM-13 | | NFO | | | | | | | | | | | | | | | | | Art 32.1 Art 32.2 Art 32.4 | |
| Security Awareness & Training | SAT-3 | Privileged Users | Technical | Basic | ID | SAT-03.5 | Mechanisms exist to provide specific training for privileged users to ensure privileged users understand their unique roles and responsibilities | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Technology Development & Acquisition | TDA-1 | Separation of Development, Testing and Operational Environments | Technical | Basic | ID | TDA-08 | Mechanisms exist to manage separate development, testing, and operational environments to reduce the risks of unauthorized access or changes to the operational environment and to ensure no impact to production systems. | | | 18.6 | | | | IVS-08 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Third-Party Management | TPM-1 | Third-Party Management | All Users | Basic | ID | TPM-01 | Mechanisms exist to facilitate the implementation of third-party management controls. | CL5 | CL5 | | | DS01.02 | | IAC-07 STA-05 STA-09 | SO4 | | | | | | | | | | | | | | | | | | | | | | | | Art 28.1 Art 28.2 Art 28.3 Art 28.4 Art 28.5 Art 28.6 | | |
| Third-Party Management | TPM-2 | Third-Party Criticality Assessments | Management | Basic | ID | 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. | | | | | | | | | | | | | | SA-14 | | | | | | | | | | | | | | | | | | | | |
| Third-Party Management | TPM-3 | Supply Chain Protection | All Users | Basic | ID | TPM-03 | Mechanisms exist to evaluate security risks associated with the services and product supply chain. | | | | | | | STA-01 STA-06 | SO10 | | | | | | | | | | | | | | | | | | | | | | | | Art 28.1 Art 28.2 Art 28.3 Art 28.4 Art 28.5 Art 28.6 | | |
| Third-Party Management | TPM-4 | Third-Party Contract Requirements | All Users | Basic | ID | TPM-05 | Mechanisms exist to identify, regularly review and document third-party confidentiality, Non-Disclosure Agreements (NDAs) and other contracts that reflect the organization's needs to protect systems and data. | CL4 | CL4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | Art 28.1 Art 28.2 Art 28.3 Art 28.4 Art 28.5 Art 28.6 | | |
| Third-Party Management | TPM-5 | Third-Party Personnel Security | All Users | Basic | ID | TPM-06 | Mechanisms exist to control personnel security requirements including security roles and responsibilities for third-party providers. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Third-Party Management | TPM-6 | Third-Party Incident Response & Recovery Capabilities | Technical | Enhanced | 8 | TPM-11 | Mechanisms exist to ensure response/recovery planning and testing are conducted with critical suppliers/providers. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Threat Management | THR-1 | Threat Awareness Program | Management | Basic | ID | THR-01 | Mechanisms exist to implement a threat awareness program that includes a cross-organization information-sharing capability. | CC3.1 | CC3.1 | | | BA08.01 | | | | | | | | | | | | | | | | | | | | | | | | | | | Art 32.1 Art 32.2 | | |
| Threat Management | THR-2 | Threat Intelligence Feeds | Technical | Enhanced | ID | THR-03 | Mechanisms exist to maintain situational awareness of evolving threats. | | | 4.4 | | | | SI-5 SI5(1) | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vulnerability & Patch Management | VPM-1 | Vulnerability & Patch Management Program (VPM) | All Users | Basic | ID | VPM-01 | Mechanisms exist to facilitate the implementation and monitoring of vulnerability management controls. | CC5.1 | CC5.1 | | 11.5 | | | TVM-02 | | | | | | | | | | | | | | | | | | | | | | | | | Art 32.1 Art 32.2 | | |
| Vulnerability & Patch Management | VPM-2 | Continuous Vulnerability Remediation Activities | All Users | Basic | ID | VPM-04 | Mechanisms exist to address new threats and vulnerabilities on an ongoing basis and ensure assets are protected against known attacks. | | | 9.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vulnerability & Patch Management | VPM-3 | Vulnerability Scanning | All Users | Basic | ID | VPM-06 | Mechanisms exist to detect vulnerabilities and configuration errors by recurring vulnerability scanning of systems and web applications. | | | 4.1 | 3.1 3.2 9.3 9.5 11.3 | | | IVS-05 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Vulnerability & Patch Management | VPM-4 | Red Team Exercises | Technical | Enhanced | 3 | VPM-10 | Mechanisms exist to utilize "red team" exercises to simulate attempts by adversaries to compromise systems and applications in accordance with organization-defined rules of engagement. | | | 20.3 20.5 20.7 | | | | | | | | | | | CA-8(2) | | | | | | | | | | | | | | | | | | | | |