| #  | QUESTION  | YES | NO | N/A | STANDARD                    | COMMENT |
|----|---|-----|----|-----|-----------------------------|---------|
|    | Planning (PL) <sup>1</sup>  |     |    |     |                             |         |
| 1. | Based on inquiry and record examination, has the Tribe or TGRA developed, documented, and disseminated to organizational personnel with planning responsibilities an agency-level planning policy that:   |     |    |     |                             |         |
|    | <ul> <li>Addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance?</li> <li>Is consistent with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines?</li> </ul>  |     |    |     | PL-1, a.1.(c) PL-1, a.1.(d) |         |
| 2. | Does the Tribe or TGRA have procedures to facilitate the implementation of the planning policy and the associated planning controls?  |     |    |     | PL-1, a.2                   |         |
| 3. | Has the Tribe or TGRA designated organizational personnel with information security and privacy responsibilities to manage the development, documentation, and dissemination of the planning policy and procedures?   |     |    |     | PL-1, b                     |         |
| 4. | Based on inquiry and record examination, has the Tribe or TGRA reviewed and updated the current planning:   |     |    |     |                             |         |
|    | <ul> <li>Policy annually and following any security incidents involving unauthorized access to Criminal Justice Information (CJI) / Criminal History Record Information (CHRI) or systems used to process, store, or transmit CJI / CHRI?</li> <li>Procedures annually and following any security incidents involving unauthorized access to CJI / CHRI or systems used to process, store, or transmit CJI / CHRI?</li> </ul> |     |    |     | PL-1, c.1<br>PL-1, c.2      |         |

 $<sup>^{\</sup>rm 1}$  These requirements are sanctionable for audit beginning October 1, 2024.

| 5. Based on inquiry and record examination, has the Tribe or TGRA developed security and privacy plans for the system that:  • Are consistent with the organization's enterprise architecture?  • Explicitly define the constituent system components?  • Describe the operational context of the system in terms of mission and business processes?  • Identify the individuals that fulfill system pl2, a.4 roles and responsibilities?  • Identify the information types processed, stored, and transmitted by the system?  • Provide the security categorization of the system, including supporting rationale?  • Describe any specific threats to the system that are of concern to the organization?  • Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  • Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  • Provide an overview of the security and privacy requirements, including a rationale for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  • Include risk determinations for security and privacy architecture and design decisions?  • Include risk determinations for security and privacy architecture and design decisions?  • Include risk determinations for security and privacy architecture and design decisions?  • Include risk determinations for security and privacy architecture and design decisions?  • Include risk determinations for security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy responsibilities? | #  | QUESTION   | YES | <b>NO</b> | N/A | STANDARD   | COMMENT |
|--|----|--|-----|-----------|-----|------------|---------|
| enterprise architecture?  Explicitly define the constituent system components?  Describe the operational context of the system in terms of mission and business processes?  Identify the individuals that fulfill system roles and responsibilities?  Identify the information types processed, stored, and transmitted by the system?  Provide the security categorization of the system, including supporting rationale?  Provide the security categorization of the system, including supporting rationale?  Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security—and privacy—related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy architecture and privacy requirements and require planning and coordination with organizational personnel with system developers; organizational personnel with information security and privacy organizational personnel with information security and privacy.  | 5. | Tribe or TGRA developed security and privacy   |     |           |     |            |         |
| Describe the operational context of the system in terms of mission and business processes?  Identify the individuals that fulfill system roles and responsibilities?  Identify the information types processed, stored, and transmitted by the system?  Provide the security categorization of the system, including supporting rationale?  Describe any specific threats to the system that are of concern to the organization?  Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  |    | enterprise architecture?   |     |           |     | PL-2, a.1  |         |
| PL-2, a.3  Identify the individuals that fulfill system roles and responsibilities?  Identify the information types processed, stored, and transmitted by the system?  Provide the security categorization of the system, including supporting rationale?  Personally identifiable information (PII)?  Personally Identifiable Information (PII)?  Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  PI. 2, a.14   |    | <ul> <li>Describe the operational context of the</li> </ul>  |     |           |     | PL-2, a.2  |         |
| roles and responsibilities?  Identify the information types processed, stored, and transmitted by the system?  Provide the security categorization of the system, including supporting rationale?  Describe any specific threats to the system that are of concern to the organization?  Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  PL 2, a.14  |    | ·  |     |           |     | PL-2, a.3  |         |
| stored, and transmitted by the system?  Provide the security categorization of the system, including supporting rationale?  Describe any specific threats to the system that are of concern to the organization?  Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy and privacy and privacy rentitecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy   |    | roles and responsibilities?  |     |           |     | PL-2, a.4  |         |
| system, including supporting rationale?  Describe any specific threats to the system that are of concern to the organization?  Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  |    | stored, and transmitted by the system?   |     |           |     | PL-2, a.5  |         |
| that are of concern to the organization?  Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?  Describe the operational environment for the system and any dependencies on or connections to other systems or system components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy   |    | • •  |     |           |     | PL-2, a.6  |         |
| <ul> <li>Provide the results of a privacy risk assessment for systems processing Personally Identifiable Information (PII)?</li> <li>Describe the operational environment for the system and any dependencies on or connections to other systems or system components?</li> <li>Provide an overview of the security and privacy requirements for the system?</li> <li>Identify any relevant control baselines or overlays, if applicable?</li> <li>Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?</li> <li>Include risk determinations for security and privacy architecture and design decisions?</li> <li>Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy</li> </ul>   |    |  |     |           |     | PL-2, a.7  |         |
| <ul> <li>Describe the operational environment for the system and any dependencies on or connections to other systems or system components?</li> <li>Provide an overview of the security and privacy requirements for the system?</li> <li>Identify any relevant control baselines or overlays, if applicable?</li> <li>Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?</li> <li>Include risk determinations for security and privacy architecture and design decisions?</li> <li>Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy</li> </ul>   |    | <ul> <li>Provide the results of a privacy risk<br/>assessment for systems processing</li> </ul>        |     |           |     | PL-2, a.8  |         |
| components?  Provide an overview of the security and privacy requirements for the system?  Identify any relevant control baselines or overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  PL 2, a.14   |    | <ul> <li>Describe the operational environment for<br/>the system and any dependencies on or</li> </ul> |     |           |     |            |         |
| <ul> <li>Identify any relevant control baselines or overlays, if applicable?</li> <li>Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?</li> <li>Include risk determinations for security and privacy architecture and design decisions?</li> <li>Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy</li> </ul>  |    |  |     |           |     | PL-2, a.9  |         |
| overlays, if applicable?  Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  PL 2 a 14  |    | 1 1 1  |     |           |     | PL-2, a.10 |         |
| for meeting the security and privacy requirements, including a rationale for any tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  PL 2 a 14  |    | overlays, if applicable?   |     |           |     | PL-2, a.11 |         |
| tailoring decisions?  Include risk determinations for security and privacy architecture and design decisions?  Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  |    | for meeting the security and privacy   |     |           |     |            |         |
| and privacy architecture and design decisions?  • Include security- and privacy-related activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  PL 2 a 14  |    | tailoring decisions?   |     |           |     | PL-2, a.12 |         |
| activities affecting the system that require planning and coordination with organizational personnel with system security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy   |    | and privacy architecture and design decisions?   |     |           |     | PL-2, a.13 |         |
| security and privacy planning and plan implementation responsibilities; system developers; organizational personnel with information security and privacy  |    | activities affecting the system that require planning and coordination with                            |     |           |     |            |         |
| information security and privacy   |    | security and privacy planning and plan implementation responsibilities; system                         |     |           |     |            |         |
| PI / o I/I   |    |  |     |           |     |            |         |
|  |    |  |     |           |     | PL-2, a.14 |         |

| #   | QUESTION  | YES | <b>NO</b> | N/A | STANDARD   | <b>COMMENT</b> |
|-----|---|-----|-----------|-----|------------|----------------|
|     | <ul> <li>Are reviewed and approved by the<br/>authorizing official or designated<br/>representative prior to plan<br/>implementation?</li> </ul>  |     |           |     | PL-2, a.15 |                |
| 6.  | Based on inquiry and record examination, does<br>the Tribe or TGRA distribute copies of the plans<br>and communicate subsequent changes to the plans<br>to organizational personnel with system security<br>and privacy planning and plan implementation<br>responsibilities; system developers; organizational<br>personnel with information security and privacy<br>responsibilities? |     |           |     | PL-2, b    |                |
| 7.  | Based on inquiry and record examination, does<br>the Tribe or TGRA review the system security and<br>privacy plans at least annually or when required<br>due to system changes or modifications?  |     |           |     | PL-2, c    |                |
| 8.  | Based on inquiry and record examination, does<br>the Tribe or TGRA update the plans to address<br>changes to the system and environment of<br>operation or problems identified during plan<br>implementation or control assessments?  |     |           |     | PL-2, d    |                |
| 9.  | Based on inquiry and record examination, does<br>the Tribe or TGRA protect the plans from<br>unauthorized disclosure and modification?  |     |           |     | PL-2, e    |                |
| 10. | Based on inquiry and record examination, does<br>the Tribe or TGRA establish and provide to<br>individuals requiring access to the system, the<br>rules that describe their responsibilities and<br>expected behavior for information and system<br>usage, security, and privacy?   |     |           |     | PL-4, a    |                |
| 11. | Based on inquiry and record examination, does<br>the Tribe or TGRA receive a documented<br>acknowledgment from such individuals, indicating<br>that they have read, understand, and agree to abide<br>by the rules of behavior, before authorizing access<br>to information and the system?   |     |           |     | PL-4, b    |                |
| 12. | Based on inquiry and record examination, does<br>the Tribe or TGRA review and update the rules of<br>behavior at least annually?  |     |           |     | PL-4, c    |                |

| #   | QUESTION  | YES | NO | N/A | STANDARD               | COMMENT  |
|-----|---|-----|----|-----|------------------------|----------|
| 13. | Based on inquiry and record examination, does<br>the Tribe or TGRA require individuals who have<br>acknowledged a previous version of the rules of<br>behavior to read and re-acknowledge annually, or<br>when the rules are revised or updated?      |     |    |     | PL-4, d                |          |
| 14. | Based on inquiry and record examination, does<br>the Tribe or TGRA include in the rules of<br>behavior, restrictions on:  |     |    |     |                        |          |
|     | <ul> <li>Use of social media, social networking sites, and external sites/applications?</li> <li>Posting organizational information on</li> </ul>   |     |    |     | PL-4, (1) a            |          |
|     | <ul> <li>public websites?</li> <li>Use of organization-provided identifiers (e.g., email addresses) and authentication secrets (e.g., passwords) for creating</li> </ul>  |     |    |     | PL-4, (1) b            |          |
|     | accounts on external sites/applications?  |     |    |     | PL-4, (1) c            |          |
| 15. | Based on inquiry and record examination, does<br>the Tribe or TGRA develop security and privacy<br>architectures for the system that:   |     |    |     |                        |          |
|     | • Describe the requirements and approach to be taken for protecting the confidentiality, integrity, and availability of organizational  |     |    |     | N.O. 1                 |          |
|     | <ul><li>information?</li><li>Describe the requirements and approach to be taken for processing PII to minimize privacy risk to individuals?</li></ul>   |     |    |     | PL-8, a.1<br>PL-8, a.2 |          |
|     | <ul> <li>Describe how the architectures are<br/>integrated into and support the enterprise<br/>architecture?</li> </ul>   |     |    |     | PL-8, a.3              |          |
|     | <ul> <li>Describe any assumptions about, and<br/>dependencies on, external systems and<br/>services?</li> </ul>   |     |    |     | PL-8, a.4              |          |
| 16. | Based on inquiry and record examination, does<br>the Tribe or TGRA review and update the<br>architectures at least annually or when changes to<br>the system or its environment occur to reflect  |     |    |     |                        |          |
|     | changes in the enterprise architecture?   |     |    |     | PL-8, b                |          |
| 17. | Based on inquiry and record examination, does<br>the Tribe or TGRA reflect planned architecture<br>changes in security and privacy plans, Concept of<br>Operations (CONOPS), criticality analysis,<br>organizational procedures, and procurements and |     |    |     |                        |          |
|     | acquisitions?   |     |    |     | PL-8, c                |          |
|     |   |     |    |     | $P_{a\sigma\epsilon}$  | e 4 of 5 |

| #   | QUESTION  | YES | NO | N/A | STANDARD | COMMENT |
|-----|---|-----|----|-----|----------|---------|
| 18. | Based on inquiry and record examination, does the Tribe or TGRA select a control baseline <sup>2</sup> for the system?                                      |     |    |     | PL-10    |         |
| 19. | Based on inquiry and record examination, does the Tribe or TGRA tailor the selected control baseline by applying specified tailoring actions <sup>3</sup> ? |     |    |     | PL-11    |         |

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<sup>&</sup>lt;sup>2</sup> Control baselines are predefined sets of controls specifically assembled to address the protection needs of a group, organization, or community of interest. Controls are chosen for baselines to either satisfy mandates imposed by laws, executive orders, directives, regulations, policies, standards, and guidelines or address threats common to all users of the baseline under the assumptions specific to the baseline. Baselines represent a starting point for the protection of individuals' privacy, information, and information systems with subsequent tailoring actions to manage risk in accordance with mission, business, or other constraints.

<sup>&</sup>lt;sup>3</sup> Tailoring a control baseline is accomplished by identifying and designating common controls, applying scoping considerations, selecting compensating controls, assigning values to control parameters, supplementing the control baseline with additional controls as needed, and providing information for control implementation.