Description of document: Three (3) United States African Development Foundation (USADF) documents:
- USADF Security Assessment Plan (SAP) Synopsis, 2019
- USADF IT Security Implementation Handbook Table Of Contents, 2019

Requested date: 01-April-2019
Release date: 14-May-2019
Posted date: 09-September-2019
Source of document: FOIA Officer
U.S. African Development Foundation
1400 I Street NW
Suite 1000
Washington, D.C. 20005

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From: Nina-Belle Mbayu <NBMbayu@usadf.gov>
Cc: June Brown <jbrown@usadf.gov>
Sent: Tue, May 14, 2019 1:55 pm
Subject: USADF FOIA 19-02 Appeal Response
Via Email

May 14, 2019

RE: USADF FOIA-19-02 Appeal

This is in response to your appeal under the Freedom of Information Act (FOIA), 5 USC § 552, dated April 1, 2019, which was received on April 2, 2019 by the FOIA Office at the United States African Development Foundation (USADF). In your appeal you requested segregable, releasable portions of the documents responsive to your request for the USADF Risk Assessment Plan and the USADF Security Handbook/Manual.

We have reviewed the documents and are releasing redacted and segregable portions of responsive documents – the Preface to the Risk Assessment Plan and the Table of Contents for the Security Handbook Manual – and are releasing USADF’s IT Security Policy Manual in its entirety. The non-releasable portions of the documents you requested fall under the following exemptions to disclosure under FOIA: 1) records that are “specifically exempted from disclosure by statute”, 2) records that are “related solely to the internal personnel rules and practices of an agency”, 3) records that are “trade secrets and commercial or financial information”, and 4) records containing “personnel and medical files and similar files” that if disclosed “would constitute a clearly unwarranted invasion of personal privacy”. 5 USC § 552(b)(2),(3),(4), and (6).

The Federal Information Security Modernization Act (FISMA) of 2014 requires agencies to “take appropriate steps to ensure the protection of information which, if disclosed, may adversely affect information security”. 44 U.S.C. §?3551. Next, the Privacy Act of 1974 requires agencies to safeguard its information systems to prevent the unauthorized release of personal records. 5 U.S.C. § 552a. Under the Privacy Act, the term "record" means information about an individual that is maintained by an agency, including, but not limited to, education, financial transactions, medical history, and criminal or employment history. 5 USCS § 552a(4). USADF’s information security systems established under FISMA include systems containing or related to personnel information, personally identifiable information (or “PII”, covered by the Privacy Act) such as medical history/disability status, confidential information, and business proprietary information. Additionally, FISMA requires USADF to ensure the protection of information that if disclosed would risk the security of, not only USADF’s systems, but also that of other interconnected agencies. 44 U.S.C. §?3551(2). USADF’s security systems are interconnected with other government agencies who are service providers to USADF for contract/procurement, personnel and EEO matters and have access to USADF’s protected information. Also, the information requested relates solely to internal personnel rules and practices as the documents are clearly marked for “Internal USADF Use” only and are intended only for use by and guidance to USADF staff. In sum,
disclosure of the withheld information would risk jeopardizing the security of USADF’s information systems and expose statutorily protected information contained in those systems.

Pursuant to 22 C.F.R. § 1502.7, there is no charge for USADF’s services in responding to your request. Please contact me or USADF’s Chief FOIA Officer, June Brown (202-233-8882; jbrown@usadf.gov), if you have any questions.

Best,

Nina-Belle S. Mbayu
Attorney Advisor/FOIA Public Liaison
U.S. African Development Foundation
1400 I Street NW
Washington, D.C. 20005
Tel.: 202-233-8808
Email: nbmbayu@usadf.gov
The requested information falls under the following exemptions to disclosure under FOIA: 1) records that are “specifically exempted from disclosure by statute”, 2) records that are “related solely to the internal personnel rules and practices of an agency”, 3) records that are “trade secrets and commercial or financial information”, and 4) records containing “personnel and medical files and similar files” that if disclosed “would constitute a clearly unwarranted invasion of personal privacy”. 5 USC § 552(b)(2),(3),(4), and (6).

The Federal Information Security Modernization Act of 2014 (FISMA) requires USADF to protect risk assessments and other computer security measures, as such information that is inherently sensitive and warrants protection from disclosure. It is in the organization’s interest to take appropriate steps to ensure the protection of its information which, if disclosed, may adversely affect information security. In this regard, USADF’s information systems contain information that is solely related to internal personnel rules and practices of the agency, commercial and financial information from private businesses and organizations doing business with USADF, and detailed information on USADF staff members’ medical history and similar personnel files. Thus, under the aforementioned exemptions, USADF must protect the integrity of its information systems.

As a matter of discretion, the USADF is providing the preface as responsive to the requested information.

SUMMARY

The purpose of the Security Assessment Plan is to provide the outline for the security assessment process and the documentation that will be developed during the annual Security Assessment and Authorization (SA&A) for the United States African Development Foundation (USADF). The Security Assessment Plan identifies the assessment environment, assessment team roles and responsibilities, assessment procedures, and security and privacy controls to be assessed. The assessment plan was based on the NIST Framework, which offers detailed and robust guidance that can provide the USADF leaders with confidence in the effectiveness of their IT system capabilities, process, and controls. The process of conducting effective security and privacy control assessments described in the Security Assessment Plan follows the NIST Special Publication 800-53A Revision 4, Assessing Security and Privacy Controls in Federal Information Systems and Organizations.

ASSESSMENT ENVIRONMENT

The first part of Security Assessment Plan includes a description of the USADF information systems and their environments of operation that are subject to assessment. Describing the current information system is essential in setting the scope of the assessment.
ASSESSMENT TEAM ROLES AND RESPONSIBILITIES

The second part of Security Assessment Plan includes the roles and responsibilities of the Security Assessment Team. The conduct of security and privacy control assessments is the primary responsibility of USADF information system owners and common control providers with oversight by their respective authorizing officials. There is also involvement in the assessment process by other parties within the organization who have a vested interest in the outcome of the assessments. Other interested parties include mission/business owners, information owners, information security personnel, and designated privacy staff.

The Security Assessment Team is responsible for conducting USADF SA&A, ensuring clear and open communication between stakeholders, and identifying, addressing, and solving problems that may arise during the assessment. The Security Assessment Team is also responsible for providing oversight on project status while staying within budget and ensuring deliverables are completed on time.

ASSESSMENT PROCEDURES

The Security Assessment Plan advises that all testing procedures during the assessment shall follow NIST Special Publication 800-53A Revision 4, Assessing Security and Privacy Controls in Federal Information Systems and Organizations. During the course of this security assessment, IT Security specialists will conduct the assessment in accordance with 800-53A. Upon completion of the assessment, a formal Security Assessment Report will be developed and presented to the organization.

SECURITY AND PRIVACY CONTROLS TO BE ASSESSED

The Security Assessment Plan includes security and privacy controls selected and a part of the controls for NIST 800-53. Prior to the assessment, it is determined what security and privacy controls for the identified security categorization are to be evaluated against the organization’s information systems. The selected controls are critical to the security of the USADF information systems, and their selection addresses specific organizational needs for the testing of the system.

Note: NIST SP 800-53, Rev 4, Security and Privacy Controls for Federal Information Systems and Organizations is reviewed for the conduct of a tailored Security Control Assessment.
The requested information falls under the following exemptions to disclosure under FOIA: 1) records that are “specifically exempted from disclosure by statute”, 2) records that are “related solely to the internal personnel rules and practices of an agency”, 3) records that are “trade secrets and commercial or financial information”, and 4) records containing “personnel and medical files and similar files” that if disclosed “would constitute a clearly unwarranted invasion of personal privacy”. 5 USC § 552(b)(2),(3),(4), and (6).

The Federal Information Security Modernization Act of 2014 (FISMA) requires USADF to protect risk assessments and other computer security measures, as such information that is inherently sensitive and warrants protection from disclosure. It is in the organization’s interest to take appropriate steps to ensure the protection of its information which, if disclosed, may adversely affect information security. In this regard, USADF’s information systems contain information that is solely related to internal personnel rules and practices of the agency, commercial and financial information from private businesses and organizations doing business with USADF, and detailed information on USADF staff members’ medical history and similar personnel files. Thus, under the aforementioned exemptions, USADF must protect the integrity of its information systems.

As a matter of discretion, the USADF is releasing a segregable Table of Contents as part of the requested information.
Table of Contents

1. INTRODUCTION – ABOUT THE SECURITY POLICY HANDBOOK ...... Error! Bookmark not defined.
   1.1 Introduction ............................................................... Error! Bookmark not defined.
   1.2 Background .............................................................. Error! Bookmark not defined.
   1.3 Definition of Information Security ................................. Error! Bookmark not defined.
      1.3.1 Definition of Security Policy ................................. Error! Bookmark not defined.
   1.4. Purpose ................................................................. Error! Bookmark not defined.
   1.5. Scope and Applicability ............................................. Error! Bookmark not defined.
   1.6. Policy Organization ............................................... Error! Bookmark not defined.
   1.7. Distribution, Updates, Questions, and Changes ................ Error! Bookmark not defined.
      1.7.1 Distribution ....................................................... Error! Bookmark not defined.
      1.7.2 Updates ............................................................. Error! Bookmark not defined.
      1.7.3 Questions ........................................................... Error! Bookmark not defined.
      1.7.4 Changes ............................................................. Error! Bookmark not defined.
      1.7.5 Comments/Suggestions ......................................... Error! Bookmark not defined.

2. PROGRAM ARCHITECTURE .................................................... Error! Bookmark not defined.
   2.1 Security Policy Program ............................................. Error! Bookmark not defined.
      2.1.1 Fundamentals of Information Security ....................... Error! Bookmark not defined.
      2.1.2 Availability ....................................................... Error! Bookmark not defined.
      2.1.3 Integrity ............................................................ Error! Bookmark not defined.
      2.1.4 Confidentiality .................................................. Error! Bookmark not defined.
      2.1.5 Goals ................................................................ Error! Bookmark not defined.
      2.1.6 Components of USADF Security Program .................... Error! Bookmark not defined.

3. IT SECURITY PROGRAM ROLES AND RESPONSIBILITIES .... Error! Bookmark not defined.
   3.1 USADF Chief Information Officer (CIO/CISO/SPO) ............. Error! Bookmark not defined.
   3.2 Designated Approving Authority (DAA) or Authorizing Official (AO) ... Error! Bookmark not defined.
   3.3 Information System Security Manager (ISSM) .................... Error! Bookmark not defined.
   3.4 Information System Security Officer (ISSO) ..................... Error! Bookmark not defined.
   3.5 Certification Agent (CA) ............................................. Error! Bookmark not defined.
   3.6 Program Executives/Foundation Directors ....................... Error! Bookmark not defined.
   3.7 System Owners ....................................................... Error! Bookmark not defined.
   3.8 Information Owners .................................................. Error! Bookmark not defined.
   3.9 Contracting Officers (COs)/Contracting Officers’ Technical Representatives (COTRs).... Error! Bookmark not defined.
   3.10 System/Network Administrators .................................... Error! Bookmark not defined.
   3.11 Information Technology Security Analyst ........................ Error! Bookmark not defined.
   3.12 USADF Employees, Contractors and Other Personnel ......... Error! Bookmark not defined.

4. MANAGEMENT POLICIES .................................................. Error! Bookmark not defined.
   4.1 SECURITY ASSESSMENT AND AUTHORIZATION (CA). Error! Bookmark not defined.
      4.1.1 Security Assessment and Authorization Policy and Procedures (CA-1) ........ Error! Bookmark not defined.
      4.1.2 Security Assessment (CA-2) .................................... Error! Bookmark not defined.
      4.1.3 Systems Interconnections (CA-3) .............................. Error! Bookmark not defined.
      4.1.4 Plan of Action and Milestones (CA-5) ....................... Error! Bookmark not defined.
      4.1.5 Security Authorization (CA-6) ................................. Error! Bookmark not defined.
      4.1.6 Continuous Monitoring (CA-7) ................................. Error! Bookmark not defined.
      4.1.7 Internal System Connections (CA-9) ........................ Error! Bookmark not defined.
4.2 SECURITY PLANNING (PL) .......................................................... Error! Bookmark not defined.
   4.2.1 Security Planning Policy and Procedures (PL-1)...... Error! Bookmark not defined.
   4.2.2 System Security Plan (PL-2)................................. Error! Bookmark not defined.
   4.2.3 Rules of Behavior (PL-4)................................. Error! Bookmark not defined.
4.3 Risk ASSESSMENT (RA).......................................................... Error! Bookmark not defined.
   4.3.1 Risk Assessment Policy and Procedures (RA-1)..... Error! Bookmark not defined.
   4.3.2 Security Categorization (RA-2).......................... Error! Bookmark not defined.
   4.3.3 Risk Assessment (RA-3)................................. Error! Bookmark not defined.
   4.3.4 Vulnerability Scanning (RA-5).......................... Error! Bookmark not defined.
4.4 SYSTEM AND SERVICES ACQUISITION (SA)............... Error! Bookmark not defined.
   4.4.1 System and Services Acquisition Policy and Procedures (SA-1) .... Error! Bookmark not defined.
   4.4.2 Allocation of Resources (SA-2).......................... Error! Bookmark not defined.
   4.4.3 System Development Life Cycle (SA-3)......... Error! Bookmark not defined.
   4.4.4 Acquisitions Process (SA-4).......................... Error! Bookmark not defined.
   4.4.5 Information System Documentation (SA-5)....... Error! Bookmark not defined.
   4.4.6 External Information System Services (SA-9)...... Error! Bookmark not defined.
4.5 PROGRAM MANAGEMENT (PM).............................................. Error! Bookmark not defined.
   4.5.1 Information System Security Plan (PM-1).......... Error! Bookmark not defined.
   4.5.2 Senior Information Security Officer (PM-2)..... Error! Bookmark not defined.
   4.5.3 Information Security Resources (PM-3)......... Error! Bookmark not defined.
   4.5.4 Plan of Action and Milestones Process (PM-4).... Error! Bookmark not defined.
   4.5.5 Information System Inventory (PM-5).............. Error! Bookmark not defined.
   4.5.6 Information System Measures of Performance (PM-6)........ Error! Bookmark not defined.
   4.5.7 Enterprise Architecture (PM-7)....................... Error! Bookmark not defined.
   4.5.8 Critical Infrastructure Plan (PM-8).................. Error! Bookmark not defined.
   4.5.9 Risk Management Strategy (PM-9)..................... Error! Bookmark not defined.
   4.5.10 Security Authorization Process (PM-10)......... Error! Bookmark not defined.
   4.5.11 Mission/Business Process Definition (PM-11)....... Error! Bookmark not defined.
5. OPERATIONAL POLICIES .......................................................... Error! Bookmark not defined.
   5.1 AWARENESS AND TRAINING ......................................... Error! Bookmark not defined.
   5.1.1 Security Awareness and Training Policy and Procedures (AT-1) .... Error! Bookmark not defined.
   5.1.2 Security Awareness (AT-2)......................... Error! Bookmark not defined.
   5.1.3 Role-based Security Training (AT-3).............. Error! Bookmark not defined.
   5.1.4 Security Training Records (AT-4).................... Error! Bookmark not defined.
   5.2 CONFIGURATION MANAGEMENT ..................................... Error! Bookmark not defined.
   5.2.1 Configuration Management Policy and Procedures (CM-1) ...... Error! Bookmark not defined.
   5.2.2 Baseline Configuration (CM-2)....................... Error! Bookmark not defined.
   5.2.3 Security Impact Analysis (CM-4)..................... Error! Bookmark not defined.
   5.2.4 Configuration Settings (CM-6)....................... Error! Bookmark not defined.
   5.2.5 Least Functionality (CM-7).......................... Error! Bookmark not defined.
   5.2.6 Information System Component Inventory (CM-8).... Error! Bookmark not defined.
   5.2.7 Software Usage Restrictions (CM-10).............. Error! Bookmark not defined.
   5.2.8 User-Installed Software (CM-11).................... Error! Bookmark not defined.
5.3 CONTINGENCY PLANNING ...................................................... Error! Bookmark not defined.
   5.3.1 Contingency Planning Policy and Procedures (CP-1) . Error! Bookmark not defined.
   5.3.2 Contingency Plan (CP-2)............................... Error! Bookmark not defined.
   5.3.3 Contingency Training (CP-3)........................... Error! Bookmark not defined.
5.3.4 Contingency Plan Testing (CP-4) .......... Error! Bookmark not defined.
5.3.5 Information System Backup (CP-9)........ Error! Bookmark not defined.
5.3.6 Information System Recovery and Reconstitution (CP-10)...... Error! Bookmark not defined.

5.4 INCIDENT RESPONSE......................... Error! Bookmark not defined.
5.4.1 Incident Response Policy and Procedures (IR-1)........ Error! Bookmark not defined.
5.4.2 Incident Response Training (IR-2) ............... Error! Bookmark not defined.
5.4.3 Incident Handling (IR-4) ......................... Error! Bookmark not defined.
5.4.4 Incident Monitoring (IR-5) ....................... Error! Bookmark not defined.
5.4.5 Incident Reporting (IR-6) ....................... Error! Bookmark not defined.
5.4.6 Incident Response Assistance (IR-7) ............ Error! Bookmark not defined.
5.4.7 Incident Response Plan (IR-8) .................... Error! Bookmark not defined.

5.5 SYSTEM MAINTENANCE.......................... Error! Bookmark not defined.
5.5.1 System Maintenance Policy and Procedures (MA-1) Error! Bookmark not defined.
5.5.2 Controlled Maintenance (MA-2) .................. Error! Bookmark not defined.
5.5.3 Remote Maintenance (MA-4) .................... Error! Bookmark not defined.
5.5.4 Maintenance Personnel (MA-5) ................. Error! Bookmark not defined.

5.6 MEDIA PROTECTION.............................. Error! Bookmark not defined.
5.6.1 Media Protection Policy and Procedures (MP-1)...... Error! Bookmark not defined.
5.6.2 Media Access (MP-2) ............................ Error! Bookmark not defined.
5.6.3 Media Sanitization (MP-6) ....................... Error! Bookmark not defined.
5.6.4 Media Use (MP-7) ............................... Error! Bookmark not defined.

5.7 PHYSICAL AND ENVIRONMENTAL PROTECTION ...... Error! Bookmark not defined.
5.7.1 Physical and Environmental Policy and Procedures (PE-1) ...... Error! Bookmark not defined.
5.7.2 Physical Access Authorizations (PE-2) .......... Error! Bookmark not defined.
5.7.3 Physical Access Control (PE-3) .................. Error! Bookmark not defined.
5.7.4 Monitoring Physical Access (PE-6) ............... Error! Bookmark not defined.
5.7.5 Visitor Access Records (PE-8) .................. Error! Bookmark not defined.
5.7.6 Emergency Lighting (PE-12) .................... Error! Bookmark not defined.
5.7.7 Fire Protection (PE-13) ......................... Error! Bookmark not defined.
5.7.9 Temperature and Humidity Controls (PE-14) ....... Error! Bookmark not defined.
5.7.10 Water Damage Protection (PE-15) .............. Error! Bookmark not defined.
5.7.11 Delivery and Removal (PE-16) ................ Error! Bookmark not defined.

5.8 PERSONNEL SECURITY.......................... Error! Bookmark not defined.
5.8.2 Position Categorization (PS-2) .................. Error! Bookmark not defined.
5.8.3 Personnel Screening (PS-3) ........................ Error! Bookmark not defined.
5.8.4 Personnel Termination (PS-4) .................... Error! Bookmark not defined.
5.8.5 Personnel Transfer (PS-5) ........................ Error! Bookmark not defined.
5.8.6 Access Agreements (PS-6) ........................ Error! Bookmark not defined.
5.8.7 Third Party Personnel Security (PS-7) .......... Error! Bookmark not defined.
5.8.8 Personnel Sanctions (PS-8) ........................ Error! Bookmark not defined.

5.9 SYSTEM AND INFORMATION INTEGRITY .......... Error! Bookmark not defined.
5.9.1 System and Information Integrity Policy and Procedures (SI-1) Error! Bookmark not defined.
5.9.2 Flaw Remediation (SI-2) .......................... Error! Bookmark not defined.
5.9.3 Malicious Code Protection (SI-3) ............... Error! Bookmark not defined.
5.9.4 Information System Monitoring (SI-4) ........... Error! Bookmark not defined.
5.9.5 Security Alerts, Advisories, and Directives (SI-5)..... Error! Bookmark not defined.
5.9.6 Information Handling and Retention (SI-12) .... Error! Bookmark not defined.
5.9.7 Memory Protections (SI-16) ........................................ Error! Bookmark not defined.

6. TECHNICAL CONTROLS.............................................. Error! Bookmark not defined.
6.1 ACCESS CONTROL.................................................. Error! Bookmark not defined.
6.1.1 Access Control Policy and Procedures (AC-1) .......... Error! Bookmark not defined.
6.1.2 Account Management (AC-2)............................... Error! Bookmark not defined.
6.1.3 Access Enforcement (AC-3)................................. Error! Bookmark not defined.
6.1.4 Unsuccessful Login Attempts (AC-7)...................... Error! Bookmark not defined.
6.1.5 System Use Notification (AC-8)............................ Error! Bookmark not defined.
6.1.6 Permitted Action without Identification or Authentication (AC-14) Error! Bookmark not defined.
6.1.7 Remote Access (AC-17) ....................................... Error! Bookmark not defined.
6.1.8 Wireless Access Control (AC-18)......................... Error! Bookmark not defined.
6.1.9 Access Control for Portable and Mobile Devices (AC-19)...... Error! Bookmark not defined.
6.1.10 Use of External Information Systems (AC-20)......... Error! Bookmark not defined.
6.1.11 Publicly Accessible Content (AC-22)................... Error! Bookmark not defined.

6.2 AUDIT AND ACCOUNTABILITY .................................. Error! Bookmark not defined.
6.2.1 Audit and Accountability Policy and Procedures (AU-1)....... Error! Bookmark not defined.
6.2.2 Auditable Events (AU-2) ...................................... Error! Bookmark not defined.
6.2.3 Content of Audit Records (AU-3) ........................... Error! Bookmark not defined.
6.2.4 Audit Storage Capacity (AU-4) .............................. Error! Bookmark not defined.
6.2.5 Response to Audit Processing Failures (AU-5) .......... Error! Bookmark not defined.
6.2.6 Audit Review, Analysis, and Reporting (AU-6) .......... Error! Bookmark not defined.
6.2.7 Time Stamps (AU-8) .......................................... Error! Bookmark not defined.
6.2.8 Protection of Audit Information (AU-9) .......... Error! Bookmark not defined.
6.2.9 Audit Record Retention (AU-11)......................... Error! Bookmark not defined.
6.2.10 Audit Generation (AU-12) .................................. Error! Bookmark not defined.

6.3 IDENTIFICATION AND AUTHENTICATION .................. Error! Bookmark not defined.
6.3.1 Identification and Authentication Policy and Procedures (IA-1) ...... Error! Bookmark not defined.
6.3.2 User Identification and Authentication (IA-2)........ Error! Bookmark not defined.
6.3.3 Identifier Management (IA-4) .............................. Error! Bookmark not defined.
6.3.4 Authenticator Management (IA-5) ......................... Error! Bookmark not defined.
6.3.5 Authenticator Feedback (IA-6) ............................. Error! Bookmark not defined.
6.3.6 Cryptographic Module Authentication (IA-7) ........ Error! Bookmark not defined.
6.3.7 Identification and Authentication (Non-Local) (IA-8) Error! Bookmark not defined.

6.4 SYSTEM AND COMMUNICATION PROTECTION .......... Error! Bookmark not defined.
6.4.1 System and Communication Protection Policy and Procedures (SC-1)........ Error! Bookmark not defined.
6.4.2 Denial of Service Protection (SC-5) ...................... Error! Bookmark not defined.
6.4.3 Boundary Protection (SC-7) ............................... Error! Bookmark not defined.
6.4.4 Cryptographic Key Establishment and Management (SC-12) ... Error! Bookmark not defined.
6.4.5 Use of Cryptography (SC-13) ............................... Error! Bookmark not defined.
6.4.6 Collaborative Computing Devices (SC-15) ............... Error! Bookmark not defined.
6.4.7 Secure Name/Address Resolution Service (SC-20) .... Error! Bookmark not defined.
6.4.8 Secure Name/Address Resolution Service (Recursive or Caching Resolver) (SC-21) Error! Bookmark not defined.
6.4.9 Architecture & Provisioning for Name/Address Resolution Service (SC-22)......... Error! Bookmark not defined.
6.4.10 Process Isolation (SC-39) .................................................. Error! Bookmark not defined.
7. POLICIES .................................................................................. Error! Bookmark not defined.
7.1 USADF PASSWORD MANAGEMENT POLICY .................. Error! Bookmark not defined.
   7.1.1 Mandatory Practices for Password Configuration ...... Error! Bookmark not defined.
   7.1.2 Mandatory Practices for Password Management .... Error! Bookmark not defined.
   7.1.3 Mandatory Password Protection Procedures ......... Error! Bookmark not defined.
   7.1.4 Password Change/Distribution Procedures ............ Error! Bookmark not defined.
7.2 USADF PATCH MANAGEMENT and REMEDIATION POLICY ...... Error! Bookmark not defined.
7.3 USADF REMOTE ACCESS POLICY ........................................ Error! Bookmark not defined.
ADF MANUAL TRANSMITTAL MEMORANDUM

DATE: July 13, 2012
TO: ADF MANUAL HOLDERS
FROM: Lloyd Pierson, President and CEO
SUBJECT: ADF Manual Section Update Project – Updated IT Manual

BACKGROUND:
A comprehensive review of all IT security-related policies, plans, and procedures was conducted over a 12-month period that included certification and accreditation activity, a FISMA audit, and an independent IT documentation assessment by an outside consulting firm. As a result, Manual Section 462 has been revised to focus strictly on IT security policy that establishes IT security goals and compliance and implementation priorities. All specific IT security implementation plans and procedures are eliminated from MS 462 and now reside in specific IT security implementation planning documents maintained outside the ADF Manual. The ADF Manual affected is summarized in the table below:

<table>
<thead>
<tr>
<th>Old Manual Number and Name</th>
<th>Updated Manual Number and Name</th>
</tr>
</thead>
</table>

MANUAL MAINTENANCE:

<table>
<thead>
<tr>
<th>SECTION</th>
<th>DATE</th>
<th>ACTION</th>
<th>EFFECTIVE DATE</th>
</tr>
</thead>
<tbody>
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<td>MS-462</td>
<td>05/03/2011</td>
<td>Remove manual section from current ADF Manual</td>
<td>07/13/2012</td>
</tr>
<tr>
<td>MS-460</td>
<td>7/13/2012</td>
<td>Insert in current ADF Manual</td>
<td>07/13/2012</td>
</tr>
</tbody>
</table>

Clearance: Doris M. Martin, General Counsel
Approved: Lloyd Pierson, President and CEO

Date: July 13, 2012

ADF Manual Transmittal Memorandum No. 142

Page 1 of 1

July 13, 2012
ADF MANUAL

SUBJECT: ADF IT Security Policies and Procedures
SECTION: MS-460
DATE: July 13, 2012
RESPONSIBLE OFFICE: Office of Information Technology
SUPERSEDES: MS 462 – IT Security Program Policy and Minimum Implementation Standards

Table of Contents:

1.0 AUTHORITY
2.0 PURPOSE
3.0 SCOPE
4.0 WAIVER
5.0 GENERAL DEFINITIONS
6.0 GENERAL IT SECURITY POLICY AND GOALS
   6.1 Policies
   6.2 Goals
   6.3 Compliance
   6.4 Roles and Responsibilities

1.0 AUTHORITY


2.0 PURPOSE

This manual section sets out the minimum policies and practices governing the security of the African Development Foundation’s (ADF) computer systems with the goal of preserving the integrity, availability, and confidentiality of the agency’s computer information systems.
3.0 SCOPE

This manual section applies to all ADF employees and contract personnel in the United States. Overseas posts are subject to the policies and requirements of this manual section to the extent they have been provided with the appropriate equipment and have the technical capacity to do so.

4.0 WAIVER

When necessary to achieve program objectives or when special circumstances make deviation clearly in the best interest of the United States Government, the President of ADF may waive any part of this manual section in writing provided such waiver does not conflict with any law or regulation applicable to the Foundation’s program.

5.0 GENERAL DEFINITIONS

5.1 General support system (GSS) is an interconnected technology resource that automates routine office functions. It normally includes hardware, software, information, data, applications, and communications, and provides support for a variety of users and applications. Individual applications support different mission-related functions. The ADF’s general support system briefly can be described as a local area network (LAN) based on Microsoft Active Directory Domain Services (Windows 2008-level functional forest/domain) architecture. Other functions supported by the ADF LAN are e-mail, word processing, spreadsheets, and graphics. The highest level of information accessed and processed on the system is “Sensitive, But Unclassified” (SBU).

5.2 Program support system (PSS) is a core business system application that ADF uses to support the management of the grant budgets and disbursement activity.

5.3 Rules of behavior constitute the requirements, practices, and controls (do’s and don’ts) governing the use, security, and acceptable level of risk of an IT system.

5.4 Sensitive information or Sensitive But Unclassified Information (“SBU Information”) is information that requires protection due to the risk and magnitude of loss or harm that could result from inadvertent or deliberate disclosure, alteration, or destruction of the information. The term includes: (1) information the improper use or disclosure of which could adversely affect the ability of an agency to accomplish its mission; (2) proprietary information; (3) information requiring protection under the Privacy Act; and (4) information protected from disclosure under the Freedom of Information Act. The term does not include classified information.
5.5 **Technical controls** consist of hardware and software controls used to provide automated protection to the system or applications. Technical controls operate within the technical system and applications.

6.0 **GENERAL IT SECURITY POLICY AND GOALS**

6.1 **General Policies**

It is the policy of the ADF to ensure the security of the Agency’s computer systems, including the systems’ physical components and the information stored within each system. The security requirements and procedures in this manual section are intended to establish measures that will eliminate or reduce the risk of security threats to the Agency’s systems to an acceptable level and protect against the financial and program costs that result when information is lost, compromised, or unavailable when needed.

6.2 **Goals**

The IT security policies and procedures in this manual section are intended to help achieve three goals: the availability, integrity and confidentiality of the Agency’s systems.

1) **Availability**

Computer systems must be available for use in a timely fashion. Any denial of a system’s use or substantial delay in a system’s processing could adversely affect the ability of an individual, office, or program to conduct business. Accordingly, protections from physical destruction, theft, or virus outbreaks, for example, should be in place.

2) **Integrity**

The integrity of the information in the Agency’s computer systems must be maintained. To achieve its statutory purpose, the Agency must be able to rely on the authenticity of the information maintained in its computer systems, such as financial records, e-mails, and program and administrative data. Integrity can be compromised by human error when entering data; when transmitting data from one computer to another; by software bugs or viruses; by hardware malfunctions, such as disk crashes; or by natural disasters, such as fires or floods. The integrity of the Agency’s systems should be protected by appropriate handling by the user and by utilizing a system architecture designed to protect data from corruption and recover lost or corrupted information.
3) Confidentiality

Sensitive information must be protected against unauthorized access or disclosure. Sensitive information is often included in legal, financial, national policy, budget, personnel, contractual, procurement, proprietary, or agency-critical information.

6.3 Compliance

Provided available resources, on an annual basis, the Chief Information Officer (CIO) or designate will review, maintain, and update three IT Security Implementation plans to ensure that minimum implementation standards found in the (current version of) National Institute for Standards and Technology Special Publication 800-53 Rev 3 are a routine part of ADF IT operations. These documents are:

1) The USADF IT Security Implementation Plan;

2) The USADF Program Support System Security Support Plan; and


To facilitate a coordinated approach to security the CIO or designate will ensure that technical controls are properly implemented in addressed in the development of the USADF IT Security Implementation Plan and system security plans with emphasis placed on implementation of priority level 1. Implementing controls for priority levels 2 and 3 will follow the achievement of level 1 and on an as needed basis. The USADF IT Security Implementation Plan will be used to support achieving compliance requirements identified by various FISMA audit and certification and accreditation activities, and updated as required.

6.4 Roles and Responsibilities

The IT Security Implementation Plan defines roles and responsibilities necessary to achieve the goals and objectives of this policy.