



AESO Reliability Standards Monthly Report

March 2010

CIP-004-2 – Cyber Security – Personnel and Training

Purpose:

Request for Interpretation

Standard:

This Version 2 CIP standard was recently approved by FERC.

Request:

The US Army Corps of Engineers asks:

- 1) What sources of verification (as alternatives to Social Security Number verification) are acceptable? Would verification of a Driver's license, passport or birth certificate be acceptable under requirement R3.1?
- 2) Is ID Verification required every seven years as stated in R3.2 for all situations or only in situations where an employee has a break in service or a name change?
- 3) What is meant by the term "seven-year criminal check" in R3.1? Is a local or state check sufficient or is a national database required?

NERC Interpretation:

1) The intent of identity verification is to ensure positive verification of an individual identity and that the risk assessment is performed on the same person who is being granted cyber or unescorted physical access. Each entity shall have a documented personnel risk assessment program that ensures each individual is positively identified.

The drafting team interprets that acceptable alternatives to the Social Security number verification are a current passport, driver's license, or identification (ID) card issued by a state or province or outlying possession of the United States; a Permanent Resident Card or Alien Registration Receipt Card; U.S., Mexican, or Canadian military ID card; or Native American tribal document or Certificate of Indian Status.

2) The drafting team interprets that the personnel risk assessment (identity verification and criminal check) is required every seven years at a minimum. Requirement R3.1 states "The Responsible Entity shall ensure that each assessment conducted include, at least, identity verification (e.g., Social Security Number verification in the U.S.) and seven year criminal check." Since the wording of Requirement R3.1 does not make a distinction between the first and subsequent personnel risk assessments, the seven-year update requires both the identity verification and the seven-year criminal check.

3) The drafting team acknowledges that the requirement does not define "seven year criminal check." The team interprets that due to the nature of cyber and unescorted physical access to critical facilities, the risk assessment must encompass a broad examination of an individual's record. Therefore, at least a "local agency check" should be performed. A local agency check is defined as a criminal history records check covering all locations where, during the period covered by the (re)investigation, the subject has resided, been employed, and/or attended school for six months or more, including current residence regardless of duration.

Applicability:

Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Service Provider, Transmission Owner, Transmission Operator, Generator Owner, Generator Operator, Load Serving Entity, NERC and Regional Entity



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Current Status:

The revised interpretation is posted for ballot until April 8. The AESO has cast an Abstain ballot.

NERC Link:

[Cyber Security – Personnel and Training](#)