

1 **Draft NISTIR 8286A**

2 **Identifying and Estimating**  
3 **Cybersecurity Risk for Enterprise Risk**  
4 **Management (ERM)**

5  
6 Kevin Stine  
7 Stephen Quinn  
8 Larry Feldman  
9 Greg Witte  
10 R. K. Gardner  
11

12  
13  
14  
15 This publication is available free of charge from:  
16 <https://doi.org/10.6028/NIST.IR.8286A-draft>  
17

20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51

**Draft NISTIR 8286A**

# **Identifying and Estimating Cybersecurity Risk for Enterprise Risk Management (ERM)**

**Kevin Stine**  
*Applied Cybersecurity Division  
Information Technology Laboratory*

**Larry Feldman**  
**Greg Witte**  
*Huntington Ingalls Industries  
Annapolis Junction, MD*

**Stephen Quinn**  
*Computer Security Division  
Information Technology Laboratory*

**R. K. Gardner**  
*New World Technology Partners  
Annapolis, MD*

This publication is available free of charge from:  
<https://doi.org/10.6028/NIST.IR.8286A-draft>

December 2020



U.S. Department of Commerce  
*Wilbur L. Ross, Jr., Secretary*

National Institute of Standards and Technology  
*Walter Copan, NIST Director and Under Secretary of Commerce for Standards and Technology*

52 National Institute of Standards and Technology Interagency or Internal Report 8286A  
53 55 pages (December 2020)

54 This publication is available free of charge from:  
55 <https://doi.org/10.6028/NIST.IR.8286A-draft>

56 Certain commercial entities, equipment, or materials may be identified in this document in order to describe an  
57 experimental procedure or concept adequately. Such identification is not intended to imply recommendation or  
58 endorsement by NIST, nor is it intended to imply that the entities, materials, or equipment are necessarily the best  
59 available for the purpose.

60 There may be references in this publication to other publications currently under development by NIST in accordance  
61 with its assigned statutory responsibilities. The information in this publication, including concepts and methodologies,  
62 may be used by federal agencies even before the completion of such companion publications. Thus, until each  
63 publication is completed, current requirements, guidelines, and procedures, where they exist, remain operative. For  
64 planning and transition purposes, federal agencies may wish to closely follow the development of these new  
65 publications by NIST.

66 Organizations are encouraged to review all draft publications during public comment periods and provide feedback to  
67 NIST. Many NIST cybersecurity publications, other than the ones noted above, are available at  
68 <https://csrc.nist.gov/publications>.

69 **Public comment period: *December 14, 2020 through February 1, 2021***

70 National Institute of Standards and Technology  
71 Attn: Applied Cybersecurity Division, Information Technology Laboratory  
72 100 Bureau Drive (Mail Stop 2000) Gaithersburg, MD 20899-2000  
73 Email: [nistir8286@nist.gov](mailto:nistir8286@nist.gov)

74 All comments are subject to release under the Freedom of Information Act (FOIA).

## 75 **Reports on Computer Systems Technology**

76 The Information Technology Laboratory (ITL) at the National Institute of Standards and  
77 Technology (NIST) promotes the U.S. economy and public welfare by providing technical  
78 leadership for the Nation's measurement and standards infrastructure. ITL develops tests, test  
79 methods, reference data, proof of concept implementations, and technical analyses to advance the  
80 development and productive use of information technology. ITL's responsibilities include the  
81 development of management, administrative, technical, and physical standards and guidelines for  
82 the cost-effective security and privacy of other than national security-related information in federal  
83 information systems.

### 84 **Abstract**

85 This document supplements NIST Interagency/Internal Report 8286, *Integrating Cybersecurity*  
86 *and Enterprise Risk Management (ERM)*, by providing additional detail regarding risk guidance,  
87 identification, and analysis. This report offers examples and information to illustrate risk  
88 tolerance, risk appetite, and methods for determining risks in that context. To support  
89 development of an enterprise risk register, this report describes documentation of various  
90 scenarios based on the potential impact of threats and vulnerabilities on enterprise assets.  
91 Documenting the likelihood and impact of various threat events through cybersecurity risk  
92 registers integrated into an enterprise risk profile, helps to later prioritize and communicate  
93 enterprise cybersecurity risk response and monitoring.

### 94 **Keywords**

95 cybersecurity risk management; cybersecurity risk measurement; cybersecurity risk register;  
96 enterprise risk management (ERM); enterprise risk profile.

### 97 **Acknowledgments**

98 The authors wish to thank those who have contributed to the creation of this draft. A detailed  
99 acknowledgement will be included in the final publication.

### 100 **Audience**

101 The primary audience for this publication includes both federal government and non-federal  
102 government cybersecurity professionals at all levels who understand cybersecurity but may be  
103 unfamiliar with the details of enterprise risk management (ERM).

104 The secondary audience includes both federal and non-federal government corporate officers,  
105 high-level executives, ERM officers and staff members, and others who understand ERM but  
106 may be unfamiliar with the details of cybersecurity.

107 This document begins with information generated at the enterprise level of the organization and  
108 frames the discussion and the response from the risk management practitioners. All readers are  
109 expected to gain an improved understanding of how cybersecurity risk management (CSRM) and  
110 ERM complement and relate to each other, as well as the benefits of integrating their use.

111

## Document Conventions

112 For the purposes of this document, the terms “cybersecurity” and “information security” are used  
113 interchangeably. While technically different in that information security is generally considered  
114 to be all-encompassing—including the cybersecurity domain—the term cybersecurity has  
115 expanded in conventional usage to be equivalent to information security. Likewise, the terms  
116 Cybersecurity Risk Management (CSRM) and Information Security Risk Management (ISRM)  
117 are similarly used interchangeably based on the same reasoning.

118

## Call for Patent Claims

119 This public review includes a call for information on essential patent claims (claims whose use  
120 would be required for compliance with the guidance or requirements in this Information  
121 Technology Laboratory (ITL) draft publication). Such guidance and/or requirements may be  
122 directly stated in this ITL Publication or by reference to another publication. This call also  
123 includes disclosure, where known, of the existence of pending U.S. or foreign patent applications  
124 relating to this ITL draft publication and of any relevant unexpired U.S. or foreign patents.

125 ITL may require from the patent holder, or a party authorized to make assurances on its behalf,  
126 in written or electronic form, either:

127 assurance in the form of a general disclaimer to the effect that such party does not hold and  
128 does not currently intend holding any essential patent claim(s); or

129 assurance that a license to such essential patent claim(s) will be made available to applicants  
130 desiring to utilize the license for the purpose of complying with the guidance or requirements  
131 in this ITL draft publication either:

132 under reasonable terms and conditions that are demonstrably free of any unfair  
133 discrimination; or

134 without compensation and under reasonable terms and conditions that are demonstrably  
135 free of any unfair discrimination.

136 Such assurance shall indicate that the patent holder (or third party authorized to make assurances  
137 on its behalf) will include in any documents transferring ownership of patents subject to the  
138 assurance, provisions sufficient to ensure that the commitments in the assurance are binding on  
139 the transferee, and that the transferee will similarly include appropriate provisions in the event of  
140 future transfers with the goal of binding each successor-in-interest.

141 The assurance shall also indicate that it is intended to be binding on successors-in-interest  
142 regardless of whether such provisions are included in the relevant transfer documents.

143 Such statements should be addressed to: [nistir8286@nist.gov](mailto:nistir8286@nist.gov).

144 **Table of Contents**

145 **1 Introduction ..... 1**

146 1.1 Supporting CSRM as an Integrated Component of ERM..... 1

147 1.2 Purpose and Scope ..... 3

148 1.3 Document Structure ..... 3

149 **2 Cybersecurity Risk Considerations Throughout the ERM Process ..... 4**

150 2.1 Risk Scope, Context, and Criteria ..... 5

151 2.1.1 Risk Appetite and Risk Tolerance..... 5

152 2.1.2 Enterprise Strategy for Cybersecurity Risk Reporting ..... 13

153 2.2 Risk Identification..... 14

154 2.2.1 Inventory and Valuation of Assets ..... 16

155 2.2.2 Determination of Potential Threats ..... 17

156 2.2.3 Vulnerability Identification ..... 25

157 2.2.4 Determining Potential Impact ..... 29

158 2.2.5 Recording Identified Risks ..... 31

159 2.2.6 Risk Categorization ..... 32

160 2.3 Detailed Risk Analysis ..... 33

161 2.3.1 Selecting Risk Analysis Methodologies ..... 33

162 2.3.2 Techniques for Estimating Likelihood and Impact ..... 35

163 2.4 Determination and Documentation of Risk Exposure..... 42

164 **3 Conclusion ..... 43**

165 **References ..... 44**

166 **List of Appendices**

167 **Appendix A— Acronyms ..... 46**

168 **Appendix B— NVD/NCP Support for Vulnerability Identification and Analysis..... 48**

170 **List of Figures**

171 Figure 1: Integration of CSRRs into Enterprise Risk Profile ..... 2

172 Figure 2: Notional Cybersecurity Risk Register Template ..... 4

173 Figure 3: Illustration of Enterprise Risk Communication and CSRM Coordination ..... 7

174 Figure 4: Continuous Interaction between ERM and CSRM using the Risk Register.... 10

175 Figure 5: CSRR highlighting Risk Description Column..... 14

176 Figure 6: Inputs to Risk Scenario Identification ..... 15

177 Figure 7: Threats as an Input to Risk Scenario Identification (Part B) ..... 17

178 Figure 8: Vulnerability Inputs to Risk Scenario Identification (Part C) ..... 26

179 Figure 9: Adverse Impact Inclusion in Risk Scenario Identification (Part D)..... 29

180 Figure 10: Example Risk Register with Sample Risk Descriptions ..... 31

181 Figure 11: CSRR Highlighting Risk Category and Current Assessment Columns ..... 33

182 Figure 12: Example Three-Point Estimate Graph (Triangle Distribution)..... 37

183 Figure 13: Example Three-Point Estimate Graph (Normal Distribution)..... 38

184 Figure 14: Example Event Tree Analysis ..... 40

185 Figure 15: Illustration of a Histogram from a Monte Carlo Estimation Simulation..... 41

186 Figure 16: Example Quantitative Analysis Results ..... 42

187 Figure 17: Example Qualitative Analysis Results ..... 42

188 Figure 18: Use of a Cybersecurity Risk Register Improves Risk Communications ..... 43

**List of Tables**

190 Table 1: Inputs and Outputs for ERM Governance and Integrated CSRM ..... 8

191 Table 2: Examples of Risk Appetite and Risk Tolerance ..... 9

192 Table 3: Example Threat Modeling Analysis ..... 18

193 Table 4: Example Bias Issues to Avoid in Risk Management..... 19

194 Table 5: Example SWOT Analysis ..... 20

195 Table 6: Cybersecurity Framework Profiles Help Consider Threats ..... 21

196 Table 7: Example Sources of Threat Information ..... 24

197 Table 8: Example Negative and Positive Impact Scenarios ..... 30

198 Table 9: Example Risk Tolerance Results Assessment ..... 36

199

## 200 **1 Introduction**

201 This report provides guidance that supplements NIST Interagency/Internal Report (NISTIR)  
202 8286, *Integrating Cybersecurity and Enterprise Risk Management (ERM)* [1]. This is the first of  
203 a series of companion publications that provide guidance for implementing, monitoring, and  
204 maintaining an enterprise approach designed to integrate cybersecurity risk management  
205 (CSRM) into ERM.<sup>1</sup> This is the first in a series of companion publications that provide guidance  
206 for implementing, monitoring, and maintaining an enterprise approach designed to integrate  
207 cybersecurity risk management (CSRM) into ERM. Readers of this report will benefit from  
208 reviewing the foundation document, NISTIR 8286, since many of the concepts described in this  
209 report are based upon practices and definitions established in that NISTIR.

210 A key point established by NISTIR 8286 is that the terms *organization* and *enterprise* are often  
211 used interchangeably. That report defines an organization as an entity of any size, complexity, or  
212 positioning within a larger organizational structure (e.g., a federal agency or company). It further  
213 defines an *enterprise* as a unique type of organization, one in which individual senior leaders  
214 govern at the highest point in the hierarchy and have unique risk management responsibilities  
215 such as fiduciary reporting and establishing risk strategy (e.g., risk appetite, methods). Notably,  
216 government and private industry cybersecurity risk management (CSRM) and ERM programs  
217 have different oversight and reporting requirements (e.g., accountability to Congress versus  
218 accountability to shareholders), but the general needs and processes are quite similar.

### 219 **1.1 Supporting CSRM as an Integrated Component of ERM**

220 There are significant similarities and variances among approaches by public- and private-sector  
221 practices for ERM/CSRM coordination and interaction. Notably, many ERM and CSRM  
222 practices treat the two as separate stovepipes. This report highlights that CSRM is an integral  
223 part of ERM, both taking its direction from ERM and informing it. The universe of risks facing  
224 an enterprise includes many factors, and risks to the enterprise's information and technology  
225 often rank high within that list. Therefore, ERM strategy and CSRM strategy are not divergent  
226 but rather CSRM strategy should be a subset of ERM strategy with particular objectives,  
227 processes, and reporting. Therefore, this report and those in this series provide a starting point for  
228 further discussion about improving ERM and CSRM coordination. As the general risk  
229 management community continues that discussion, NIST will continue to solicit and publish  
230 lessons learned and shared by that community.

231 Section 2 shows that enterprise governance activities direct the strategy and methods for risk  
232 management, including CSRM. Results of those activities are recorded in various risk registers.  
233 Cybersecurity risks are documented through cybersecurity risk registers (CSRRs) that are  
234 aggregated at appropriate levels and are used to create an *enterprise* cybersecurity risk register,  
235 that, in turn, becomes part of a broader Enterprise Risk Register (ERR) as depicted in Figure 1.  
236 The ERR, when prioritized by those with fiduciary responsibilities, represents an Enterprise Risk  
237 Profile.

---

<sup>1</sup> For the purposes of this document, the terms "cybersecurity" and "information security" are used interchangeably.





## 272 1.2 Purpose and Scope

273 This document focuses on improving CSRM understanding and communications between and  
274 among cybersecurity professionals, high-level executives, and corporate officers to help ensure  
275 the effective integration of cybersecurity considerations as a critical subset of the overarching  
276 enterprise risks. The report recognizes that the risk management community has observed an  
277 opportunity for increased rigor in the manner in which cybersecurity risk identification, analysis,  
278 and reporting are performed at all levels of the enterprise. This publication is designed to provide  
279 guidance and to further conversations regarding ways to improve CSRM and the coordination of  
280 CSRM with ERM.

281 The goals of this document are to:

- 282 • Help describe governance processes by which senior leaders build strategy and express  
283 expectations regarding CSRM as part of ERM and
- 284 • Provide guidance for CSRM practitioners in applying the risk direction received from  
285 senior leaders, communicating results, coordinating success, and integrating activities.

286 This document continues the discussion to bridge existing private industry risk management  
287 processes with government-mandated federal agency enterprise and cybersecurity risk  
288 requirements derived from OMB Circulars A-123 and A-130 [6]. It builds upon concepts  
289 introduced in NISTIR 8286 and complements other documents in this series. It references some  
290 materials that are specifically intended for use by federal agencies and will be highlighted as  
291 such, but the concepts and approaches are intended to be useful for all enterprises.

## 292 1.3 Document Structure

293 This publication helps establish an enterprise risk strategy (Section 2.1) to identify risks to  
294 mission objectives (Section 2.2)), and to analyze (Section 2.3) their likelihood and possible  
295 impact while considering the enterprise's risk strategy as expressed through risk appetite and risk  
296 tolerance. The remainder of this document is organized into the following major sections: <sup>4</sup>

- 297 • Section 2 details CSRM considerations, including enterprise risk strategy for risk  
298 identification and risk analysis.
- 299 • Section 3 provides a short summary and conclusion.
- 300 • The References section provides links to external sites or publications that provide  
301 additional information.
- 302 • Appendix A contains acronyms used in the document.
- 303 • Appendix B describes how the National Vulnerability Database (NVD) and National  
304 Checklist Program (NCP) support risk identification activities.

---

<sup>4</sup> An Informative Reference that crosswalks the contents of this document and the NIST Framework for Improving Critical Infrastructure Cybersecurity (the NIST Cybersecurity Framework) will be posted as part of the National Cybersecurity Online Informative References (OLIR) Program. [2] See <https://www.nist.gov/cyberframework/informative-references> for an overview of OLIR.

**2 Cybersecurity Risk Considerations Throughout the ERM Process**

306 Because digital information and technology are valuable enablers for enterprise success and  
 307 growth, they must be sufficiently protected from various types of risk. Government entities for  
 308 whom growth may not be a strategic objective are still likely to find value in dynamically adding  
 309 or changing their services or offerings as their constituents’ needs evolve. Thus, both private and  
 310 public sector endeavors need to evaluate the role of information and technology in achieving  
 311 enterprise objectives. This understanding enables a deeper consideration of the various  
 312 uncertainties that jeopardize those objectives.

313 In the context of ERM, senior leaders must clearly express expectations regarding how risk  
 314 should be managed. Those expectations provide CSRM practitioners with objectives for  
 315 managing cybersecurity risks, including methods for reporting the extent to which risk  
 316 management activities successfully achieve those objectives. The document for recording and  
 317 sharing information about those risks is the cybersecurity risk register (CSRR).

318 NISTIR 8286 describes the use of risk registers, example fields for those registers, and the fact  
 319 that prioritized risk register contents serve as the basis of a risk profile. That report also states  
 320 that, while a risk register represents various risks at a single point in time, it is important for the  
 321 enterprise to ensure that the model is used in a consistent and iterative way. As risks are  
 322 identified (including calculation of likelihood and impact), the risk register will be populated  
 323 with relevant information once decisions have been made. As risks are reviewed, the agreed-  
 324 upon risk response becomes the current state, and the cycle begins anew.

325 Figure 2 provides an example of a blank risk register. The red box shows fields that are relevant  
 326 to the processes described in this report. The remaining columns will be described in a  
 327 subsequent publication. Note that, while prioritization is informed by some of the information  
 328 recorded in these columns, risk priority will be discussed in that future publication as part of  
 329 Risk Evaluation and Risk Response activities. While the example illustrates a template for  
 330 cybersecurity risks, a similar template could be used for any type of risk in the enterprise.

Notional Cybersecurity Risk Register											
ID	Priority	Risk Description	Risk Category	Current Assessment			Risk Response Type	Risk Response Cost	Risk Response Description	Risk Owner	Status
				Likelihood	Impact	Exposure Rating					
1											
2											
3											
4											
5											

Continually Communicate, Learn, and Update

331  
332

**Figure 2: Notional Cybersecurity Risk Register Template**

## 333 2.1 Risk Scope, Context, and Criteria

334 Effective management of risk throughout the enterprise depends upon cooperation at each level.  
335 As enterprise senior leaders provide direction regarding how to manage risks (including  
336 cybersecurity risks), stakeholders at other levels use that direction to achieve, report, and monitor  
337 outcomes. This management approach helps ensure that CSRM strategy is formulated as a part  
338 of (and flows from) ERM strategy.

339 ISO 31000:2018 points out that there are three prerequisites for supporting a CSRM program as  
340 an input to ERM [3]:

- 341 • The *scope* of the CSRM activities should be defined;
- 342 • The internal and external *context* of the CSRM activities should be determined; and
- 343 • The criteria from enterprise stakeholders should be declared and documented through a  
344 comprehensive CSRM *strategy*.

345 Senior leaders define the ERM scope, context, and strategy, which inform enterprise priorities,  
346 resource utilization criteria, and responsibilities for various enterprise roles. The ERM strategy  
347 helps define how various organizational systems, processes, and activities cooperate to achieve  
348 risk management goals, including those for CSRM, in alignment with mission objectives.

### 349 2.1.1 Risk Appetite and Risk Tolerance

350 CSRM, as an important component of ERM, helps assure that cybersecurity risks do not hinder  
351 established enterprise mission and objectives. CSRM also helps ensure that exposure from  
352 cybersecurity risk remains within the limits assigned by enterprise leadership. Figure 3 illustrates  
353 the ongoing communications among ERM and CSRM stakeholders to set, achieve, and report on  
354 risk expectations throughout the enterprise. This illustration builds upon the well-known levels  
355 of the Organization-Wide Risk Management Approach described in NIST Special Publication  
356 (SP) 800-37, Revision 2 [4]. The diagram extends the Notional Information and Decision Flows  
357 figure from the NIST *Framework for Improving Critical Infrastructure Cybersecurity*  
358 (Cybersecurity Framework) by indicating risk appetite and risk tolerance definition,  
359 interpretation, and achievement [5].

360 The process described in Figure 3 illustrates that *risk appetite* is declared at the enterprise level.  
361 Risk appetite provides a guidepost to the types and amount of risk, on a broad level, that senior  
362 leaders are willing to accept in pursuit of mission objectives and enterprise value.<sup>5</sup> As leaders  
363 establish an organizational structure, business processes, and systems to accomplish enterprise  
364 mission objectives, the results define the structure and expectations for CSRM at all levels.<sup>6</sup>  
365 Based on these expectations, cybersecurity risks are identified, managed, and reported through

---

<sup>5</sup> NISTIR 8286 supports the OMB Circular A-123 definition of risk appetite as “the broad-based amount of risk an organization is willing to accept in pursuit of its mission/vision. It is established by the organization’s most senior level leadership and serves as the guidepost to set strategy and select objectives.” [6]

<sup>6</sup> The term “system” throughout this publication pertains to information systems, which are discrete sets of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information, whether such information is in digital or non-digital form.

366 risk registers and relevant metrics. The register then directly supports the refinement of risk  
367 strategy considering mission objectives.

368 Risk appetite can be interpreted by enterprise- and organization-level leaders to develop specific  
369 *risk tolerance*, which is defined by OMB as “the acceptable level of variance in performance  
370 relative to the achievement of objectives” [6]. Risk tolerance represents the specific level of  
371 performance risk deemed acceptable within the risk appetite set by senior leadership (while  
372 recognizing that such tolerance can be influenced by legal or regulatory requirements).<sup>7</sup> Risk  
373 tolerance can be defined at the Executive Level (e.g., at the Department level for U.S. federal  
374 agencies), but OMB offers a bit of discretion to an organization, stating that risk tolerance is  
375 “generally established at the program, objective, or component level.”<sup>8</sup>

376 Risk appetite and risk tolerance are related but distinct, in a similar manner to the relationship  
377 between governance and management activities. Where risk appetite statements define the  
378 overarching risk guidance, risk tolerance statements define the specific application of that  
379 direction. Together, these risk appetite and risk tolerance statements represent risk limits, help  
380 communicate risk expectations, improve the focus of risk management efforts, and reduce the  
381 likelihood of unacceptable loss. Achievement of those expectations is conveyed through risk  
382 registers that document and communicate risk decisions. Risk assessment results and risk  
383 response actions at the System Level are reflected in CSRRs. As CSRRs from multiple systems  
384 are collated and provided to higher level business managers at the Organization level, those  
385 managers can evaluate results and refine risk tolerance criteria to optimize value delivery,  
386 resource utilization, and risk. The aggregation of all enterprise CSRRs at the Enterprise Level  
387 enables senior leaders to monitor risk response considering the expectations set. Figure 2  
388 illustrates the tight coupling of ERM, where senior leaders set enterprise risk strategy and make  
389 risk-informed decisions, and CSRM, where cybersecurity practitioners can best identify where  
390 cybersecurity risk is likely to occur.

---

<sup>7</sup> OMB Circular A-123 states that “Risk must be analyzed in relation to achievement of the strategic objectives established in the Agency strategic plan (See OMB Circular No. A-11, Section 230), as well as risk in relation to appropriate operational objectives. Specific objectives must be identified and documented to facilitate identification of risks to strategic, operations, reporting, and compliance.” [6]

<sup>8</sup> Examples of the Organization Level include Business Units, Company Departments, or Agency Divisions.

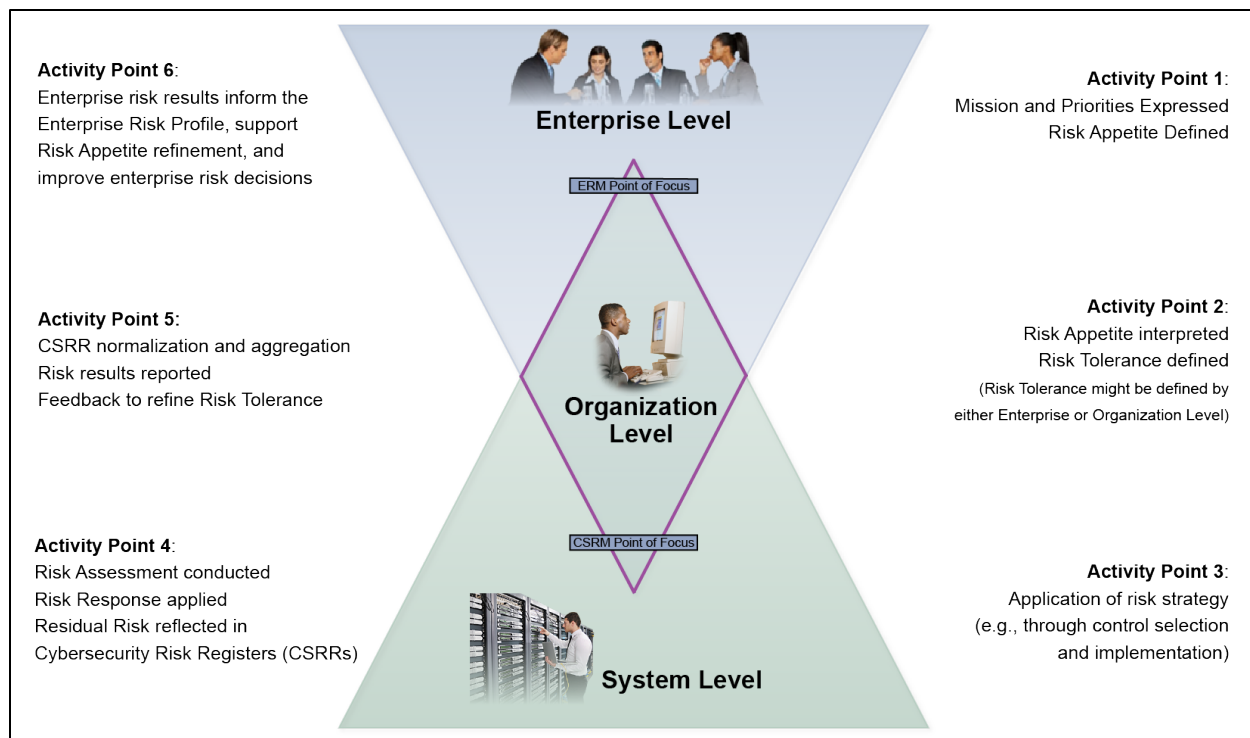


Figure 3: Illustration of Enterprise Risk Communication and CSRM Coordination<sup>9</sup>

391  
392

393 Notably, Figure 3 and Figure 4 illustrate general integration and coordination activities but are  
 394 fairly simplistic representations. For example, risk appetite statements should originate from the  
 395 most senior leaders, but those leaders may choose to delegate the creation of cybersecurity risk  
 396 appetite statements to a senior cybersecurity risk official (e.g., CISO or Risk Executive  
 397 Function). Each enterprise is unique, and the intent of this document is to foster the integration of  
 398 CSRM as part of ERM. Readers should also note that the processes described are cyclical. Early  
 399 iterations may include the definition of terms, strategies, and objectives. Subsequent iterations  
 400 may focus on refining those objectives based on previous results, observations of the risk  
 401 landscape, and changes within the enterprise.

402 Table 1 describes the process by which senior leaders express their strategy and expectations for  
 403 managing cybersecurity risk throughout the enterprise. In general, NISTIR 8286A addresses  
 404 activity points 1 through 3, and activity points 4 through 6 will be addressed in NISTIR 8286B.

<sup>9</sup> Figure 3 on page 8 further decomposes the risk management cycle, information flow, and decision points illustrated in Figure 2, which provides a high-level understanding in the context of the organization structure. Subsequent publications in this series will provide additional information about the activities described in Figure 2 and Table 1.

**Table 1: Inputs and Outputs for ERM Governance and Integrated CSRM**

Activity Point	Inputs	Outputs
1. Setting risk expectations and priorities	Internal and external risk context; enterprise roles and responsibilities; governance framework and governance system for managing risk for all types of risks	Documentation of enterprise priorities in light of mission objectives and stakeholder values; direction regarding budget (e.g., authorization for capital and operating expenditures); risk appetite statements germane to each risk management discipline including cybersecurity
2. Interpreting risk appetite to define risk tolerance statements	Enterprise priorities in light of mission objectives and stakeholder values; direction regarding budget (e.g., authorization for capital and operating expenditures); risk appetite statements	Risk tolerance statements (and metrics) to apply risk appetite direction at the Organization Level; Direction regarding methods to apply CSRM (e.g., centralized services, compliance / auditing methods, shared controls to be inherited and applied at the System Level)
3. Applying risk tolerance statements to achieve System Level CSRM	Risk tolerance statements; direction regarding shared services and controls; lessons learned from previous CSRM implementation (and those of peers)	Inputs to preparatory activities (e.g., NIST Risk Management Framework, or RMF, Prepare step); System categorization; selection and implementation of system security controls
4. Assessing CSRM and reporting system-level risk response through CSRRs	Security plans; risk response; system authorization (or denial of authorization with referral back for plan revision)	Risk assessment results; CSRRs describing residual risk and response actions taken; Risk categorization and metrics that support ongoing assessment, authorization, and continuous monitoring
5. Aggregating Business Level CSRRs	CSRRs showing System Level risk decisions and metrics; Internal reports from compliance / auditing processes to confirm alignment with enterprise risk strategy; Observations regarding CSRM achievement in light of risk strategy	CSRRs aggregated and normalized based on enterprise-defined risk categories and measurement criteria; Refinement of risk tolerance statements, if needed, to ensure balance among value, resources, and risk
6. Integrating CSRRs into Enterprise CSRR, ERR, and Enterprise Risk Profile	Normalized and harmonized CSRRs from various Organization Level CSRM reports; Internal compliance and auditing reports; Results from other (non-cybersecurity) risk management activities; Observations regarding ERM and CSRM achievement	Aggregated and normalized Enterprise CSRR; integrated Enterprise Risk Register aligning CSRM results with those of other risk categories; Refinement of risk appetite tolerance statements and risk management direction to ensure balance among value, resources, and risk; Enterprise Risk Profile for monitoring and reporting overall risk management activities and results



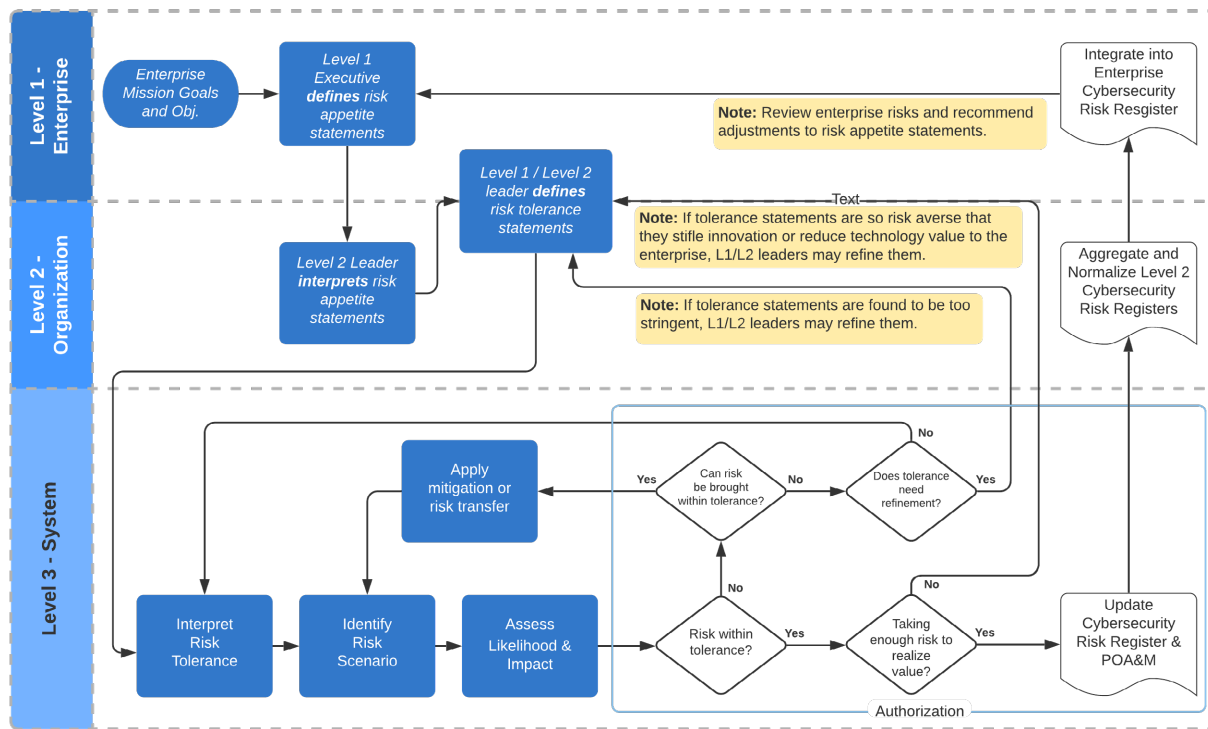
406 Table 2 provides examples of actionable, measurable risk tolerance that illustrate the application  
 407 of risk appetite to specific context within the organization level structure:

408 **Table 2: Examples of Risk Appetite and Risk Tolerance**

Example Enterprise Type	Example Risk Appetite Statement	Example Risk Tolerance Statement
Global Retail Firm	Our customers associate reliability with our company’s performance, so service disruptions must be minimized for any customer-facing websites.	Regional managers may permit website outages lasting up to 2 hours for no more than 5% of its customers.
Government Agency	Mission-critical systems must be protected from known cybersecurity vulnerabilities.	Systems designated as High Value Assets (per OMB definition) must be patched against critical software vulnerabilities (severity score of 10) within fourteen days of discovery.
Internet Service Provider	The company has a LOW risk appetite with regard to failure to meet customer service level agreements including network availability and communication speeds.	Patches must be applied to avoid attack-related outages but also must be well-tested and deployed in a manner that does not reduce availability below agreed-upon service level.
Academic Institution	The institution understands that mobile computers are a necessary part of the daily life of students and some loss is expected. The leadership, however, has <u>no</u> appetite for loss of any sensitive data (as defined by the Data Classification Policy).	Because the cost of loss prevention for students’ laptop workstations is likely to exceed the cost of the devices, it is acceptable for up to 10% to be misplaced or stolen if, and only if, sensitive institution information is prohibited from being stored on students’ devices.
Healthcare Provider	The Board of Directors has decided that the enterprise has a low risk appetite for any cybersecurity exposures caused by inadequate access control or authentication processes.	There will always be some devices that do not yet support advanced authentication, but 100% of critical healthcare business applications must use multi-factor authentication.

409 Figure 4 illustrates a more detailed information flow of inputs and outputs, as described in Figure  
 410 2 and Table 1. Senior leaders and business managers define risk tolerance direction that is  
 411 applied at the System Level. System Level practitioners interpret those risk tolerance statements  
 412 and apply CSRM activities to achieve risk management objectives. The results are then reviewed  
 413 to confirm effectiveness, highlight opportunities for improvement, and identify important trends  
 414 that might require Organization or Enterprise Level action. The specific process activities will be  
 415 based on the risk management methods applied but will generally include those below.





416  
417

Figure 4: Continuous Interaction between ERM and CSRM using the Risk Register<sup>10</sup>

418 The activities in Figure 4 are listed below.<sup>11</sup>

- 419 • As described in earlier portions of this section, leaders at Levels 1 and 2 define specific  
420 and measurable risk appetite and risk tolerance statements that reinforce enterprise  
421 mission objectives and organization goals. Those leaders may also choose to define  
422 aggregate metrics (e.g., key risk indicators [KRIs], key performance indicators [KPIs]) to  
423 help track and report achievement of risk direction.
- 424 • At Level 3, practitioners interpret the risk tolerance statements for the specific systems  
425 that operate to provide business (or agency) benefits. Those in various roles (e.g., system  
426 owners, security officers) work together to derive system-level requirements for  
427 confidentiality, integrity, and availability.
- 428 • The value of each asset of a given system (e.g., information type, technical component,  
429 personnel, service provider) is appraised to determine how critical or sensitive it is to the  
430 operation of the system (see Section 2.2.1). Subsequent risk decisions depend on accurate  
431 understanding of the importance of each resource to the system.

<sup>10</sup> Figure 3 demonstrates select communications, processes, and decisions germane to the risk appetite, risk tolerance, and risk register interactions among the three levels of an enterprise addressed by this report and is not intended to be exhaustive.

<sup>11</sup> For those topics that are addressed in NISTIR 8286A, a pointer to the relevant section is included. Topics without a pointer to sections on this document will be addressed in subsequent publications in this series.

- 432 • For each of these components, the practitioner identifies threat sources that might cause a  
433 harmful effect (see Section 2.2.2) and the vulnerabilities or conditions that might enable  
434 such an effect (see Section 2.2.3). To complete development of the risk scenario, the  
435 practitioner determines the adverse effect of the threat source exploiting the vulnerable  
436 conditions. The scenario is recorded in the CSRR as the “Risk Description” (see Section  
437 2.2.5). The category for the scenario will be recorded in the “Risk Category” column,  
438 based on enterprise criteria, to support risk correlation, aggregation, and reporting.
- 439 • The practitioner performs risk analysis (see Section 2.3) to determine the likelihood that  
440 the threat events and vulnerable conditions would result in harmful impacts to the system  
441 asset. Similarly, the practitioner analyzes the impact value and calculates the risk  
442 exposure using the methodology defined in the enterprise risk strategy (e.g., as the  
443 product of [risk likelihood] x [risk impact].) The results of these analyses are recorded in  
444 the CSRR’s “Current Assessment” column as “Likelihood,” “Impact,” and “Exposure.”
- 445 • The determined exposure is compared with the risk tolerance. If exposure is within risk  
446 tolerance limits, the risk may be “**accepted**.” If exposure exceeds tolerable levels of risk,  
447 practitioners can consider whether they can achieve risk tolerance through other forms of  
448 risk response. In many cases, security controls may be applied to **mitigate** risk by  
449 reducing the likelihood or impact of a risk to a tolerable level. Risk response may also  
450 include risk **transfer**, also known as risk sharing. For example, an organization might  
451 hire an external organization to process sensitive transactions (e.g., payment card  
452 transactions), thus reducing the likelihood that such sensitive data would be processed by  
453 an in-house system. Another common risk transfer method is through cybersecurity  
454 insurance policies that can help reduce the economic impact if a risk event occurs.
- 455 • In some cases, it might be determined that the exposure exceeds risk tolerance and cannot  
456 be brought within limits through any combination of mitigation or risk transfer. In this  
457 case, practitioners (e.g., the system owner) may need to work with Level 2 leaders to  
458 revisit the risk tolerance itself. This negotiation presents an opportunity for the Level 2  
459 and Level 3 managers to determine the best course of action, in light of mission  
460 objectives, to refine the risk direction (e.g., through an exception process, an adjustment  
461 to the risk tolerance statement, or increased security requirements for the relevant  
462 system). In any case, stakeholders will have applied a proactive approach to balancing  
463 risk and value to the benefit of the enterprise.
- 464 • If an unacceptable cybersecurity risk cannot be adequately treated in a cost-effective  
465 manner, that risk must be **avoided**. Such a condition may require significant redesign of  
466 the system or service. These circumstances should be rare, and they highlight the value of  
467 CSRM coordination early in the system engineering process. Notably, risk avoidance is  
468 not the same as ignoring a risk.

- 469       • Results of risk activities and decisions are recorded in the CSRR and, if applicable, in a  
470       documented Plan of Actions & Milestones (POA&M)<sup>12</sup> that records future risk activities  
471       agreed upon.
- 472       • The process continues until all system assets have been evaluated for risk from currently  
473       understood threats and vulnerabilities. For some enterprises, the composite set of system  
474       risks (as recorded in the CSRR), risk response applied, agreements regarding additional  
475       CSRM actions to be taken (e.g., as recorded in the POA&M), and other relevant artifacts  
476       will be reviewed by a senior official to confirm that risk decisions and risk response align  
477       with risk tolerance and risk appetite directives. For federal government agencies, this  
478       represents the system authorization process.
- 479       • Subsequently, CSRRs from throughout the Business Level are normalized and  
480       aggregated to provide a composite view of the risk posture and decisions for that  
481       Organization. As Level 2 managers consider feedback from system CSRM activities,  
482       those managers may decide to refine risk tolerance levels. It may be that the aggregate  
483       risk across multiple systems represents too great an exposure and needs to be reduced. In  
484       other cases, based on successful risk management results, stakeholders may be able to  
485       permit a little more risk in some areas if such a decision would support mission  
486       objectives and potentially save resources or allow them to be directed to areas that require  
487       additional resources in order to meet expected risk tolerances.
- 488       • Similar reviews and refinement occur at Level 1 to support enterprise governance and  
489       risk management decisions. Some types of enterprises may be required to formally  
490       disclose risk factors (e.g., through annual reports), and this aggregate understanding of  
491       cybersecurity risks and risk decisions supports that fiduciary responsibility. These  
492       activities may also help others, such as Federal Government agencies, to help comply  
493       with mandatory requirements such as those established by OMB.
- 494       Interpreting risk tolerance at Level 3, practitioners develop requirements and apply security  
495       controls to achieve an acceptable level of risk. This process helps to ensure that CSRM occurs in  
496       a cost-effective way. As an example, consider the global retail firm described in the first row of  
497       Table 2. The system owner of the customer website will select controls that will ensure  
498       adherence to availability service levels. In deciding which controls to apply, the system owner  
499       collaborates with a security team to consider methods to meet service level objectives. The team  
500       can contact the local power utility supplier to determine electrical availability history and gather  
501       other information regarding the likelihood of the risk of a loss of power to the important website.  
502       This additional information might help the system owner decide whether to invest in a backup  
503       generator to ensure sufficient power availability.

---

<sup>12</sup> Federal agencies are required to develop a plan of action and milestones (POA&M) for each system. The plan includes a listing of unaccepted risks and associated plans to mitigate the risks. However, the time horizon to resolve the outstanding risk may exceed the current reporting cycle. Private industry is also required to document this type of risk in similar ways (e.g., quarterly SEC Form Q-10 filings, a prospectus). POA&Ms will be addressed in greater detail later in this series when risk mitigation strategies are discussed.

504 Results from previous assessments can be useful for estimating the likelihood of achieving risk  
505 goals in the future (this topic is described in Section 2.3.2.1.) The team would then move to the  
506 next risk scenario (e.g., perhaps an internet service outage) and review the history and reliability  
507 of the organization’s telecommunications provider to ascertain the likelihood and impact of a  
508 loss of service. Iterating through each potential risk, as described in Figure 4, practitioners can  
509 develop a risk-based approach to fulfilling CSRM objectives in light of risk appetite and risk  
510 tolerance. This, in turn, helps CSRM practitioners demonstrate how their actions directly support  
511 mission objectives and enterprise success.

## 512 **2.1.2 Enterprise Strategy for Cybersecurity Risk Reporting**

513 The enterprise strategy for cybersecurity risk management and monitoring includes common  
514 definitions for how and when assessment, response, and monitoring should take place. Notably,  
515 ERM monitoring is for communication and coordination regarding overall risk and should not be  
516 confused with system-level monitoring (or continuous monitoring.)

517 Guidance from senior leaders provides risk guidance—including advice regarding mission  
518 priority, risk appetite and tolerance, and capital and operating expenses to manage known risks—  
519 to the organizations within their purview. There are some details that need to be defined at the  
520 Enterprise Level so that information can be combined and compared effectively, including the  
521 ability to communicate about risks through the various types of risk registers.

522 While many of these details will be delegated to Organizational Level processes, several key  
523 factors should be defined at the Enterprise Level, including:

- 524 • Criteria regarding risk category selection that enables risk register entries to be  
525 consolidated and compared;
- 526 • Direction regarding the classification and valuation of enterprise assets, including  
527 approved methods for business impact analysis;
- 528 • Assessment methodologies, including direction regarding analysis techniques and the  
529 appropriate scales to be applied;
- 530 • Frequency of assessment, reporting, and potential escalation;
- 531 • Methods for tracking, managing, and reporting (i.e., use of the cybersecurity risk  
532 register); and,
- 533 • Resources available for risk treatment, including common baselines, common controls,  
534 and supply chain considerations.

535 As cybersecurity risks are recorded, tracked, and reassessed throughout the risk life cycle and  
536 aggregated within the enterprise cybersecurity risk register, this guidance ensures that risk will  
537 be consistently communicated, managed, and potentially escalated. Strategic guidance from  
538 enterprise stakeholders should also include:

- 539 • Definition of the organizational boundaries to which CSRM activities will apply;  
540 documentation that the scope for cybersecurity objectives supports alignment among  
541 enterprise, business and mission objectives, and operational achievement.
- 542 • Direction regarding specific roles for managing, communicating, and integrating risks  
543 throughout the enterprise; defining the types of stakeholders (by role) will support risk  
544 communication and timely decision-making.
- 545 • Determination of key risk indicators (KRIs) and key performance indicators (KPIs) that  
546 will support the management and monitoring of the extent to which risk response remains  
547 within acceptable levels.

548 Through the processes described above, senior leaders express risk limits and expectations as  
549 risk appetite statements. That risk appetite is then interpreted through risk tolerance and then  
550 applied at the System Level. The subsections below describe how feedback is provided using the  
551 risk register to identify and document risk, analysis, and results.

552 **2.2 Risk Identification**

553 This section describes methods for identifying and documenting sources and their potential  
554 consequences (recorded in the Risk Description column of the CSRR, as shown by the red border  
555 in Figure 5.)

Notional Cybersecurity Risk Register											
ID	Priority	Risk Description	Risk Category	Current Assessment			Risk Response Type	Risk Response Cost	Risk Response Description	Risk Owner	Status
				Likelihood	Impact	Exposure Rating					
1		Parts A, B, C, and D (described below)									
2											
3											
4											
5											

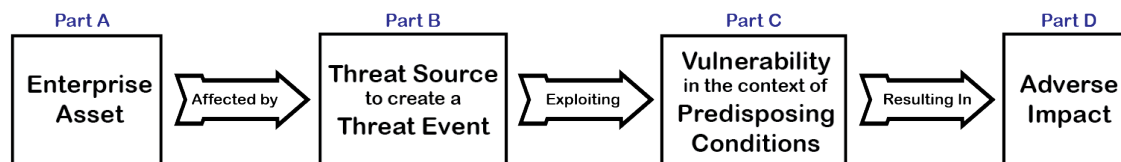
556 Continually Communicate, Learn, and Update

557 **Figure 5: CSRR highlighting Risk Description Column<sup>13</sup>**

558 Risk identification represents a critical activity for determining the uncertainty that can impact  
559 mission objectives. The primary focus of NISTIR 8286A is on negative risks (i.e., threats and  
560 vulnerabilities that lead to harmful consequences), but it is important to remember that positive  
561 risks represent a significant opportunity and should be documented and reviewed as well.  
562 Consideration and details regarding positive risks will be addressed in subsequent publications.  
563 Through the activities in the following sections, risk practitioners determine and record those

<sup>13</sup> The CSRR template is available in the [Open Risk Register Format \(ORRF\)](#) format; an automated JavaScript Object Notation (JSON) notation for organizations maintaining automated applications that provide detailed tracking and reporting. The CSRR template is also available in comma separated value (CSV) format at the same link.

564 events that could enhance or impede objectives, including the risk of failing to pursue  
565 opportunities.



566  
567

Figure 6: Inputs to Risk Scenario Identification<sup>14</sup>

568 As shown in Figure 6, which is derived from the Generic Risk Model in NIST SP 800-30,  
569 Revision 1, *Guide for Conducting Risk Assessments*, cybersecurity risk identification is  
570 composed of four necessary inputs—parts A through D—in the Risk Description cell of the  
571 cybersecurity risk register [7]. Combining these elements into a risk scenario helps to provide the  
572 full context of a potential loss event. The use of this scenario-based approach helps ensure  
573 comprehensive risk identification by considering many types of physical and logical events that  
574 might occur. Notably, the scope of cybersecurity has expanded from its original boundaries of  
575 adversarial digital attacks and encompasses all types of uncertainty that can impact any form of  
576 information and technology. Accordingly, the risks to be identified and registered are much  
577 broader as well.

578 The completion of the Risk Description column is composed of four activities that are detailed in  
579 Subsections 2.2.1 through 2.2.4. The activities include:

- 580 • Part A – Identification of the organization’s relevant assets and their valuation
- 581 • Part B – Determination of potential threats that might jeopardize the confidentiality,  
582 integrity, and availability of those assets
- 583 • Part C – Consideration of vulnerabilities or other predisposing conditions of assets that  
584 make a threat event possible
- 585 • Part D – High-level evaluation of the potential consequences if the threat source (part B)  
586 exploited the weakness (part C) against the organizational asset (part A)

587 The integration of those elements enables the practitioner to record each scenario in the CSRR as  
588 a description of cybersecurity risk. The quantity and level of detail of the risks identified should  
589 be in accordance with the risk strategy.

590 Enterprises that are just beginning to integrate the cybersecurity risk register results into broader  
591 ERM activities will benefit from focusing on an initial and limited number of top risks. Those  
592 creating a risk management program for the first time should not wait until the risk register is  
593 completed before addressing extraordinary issues. However, over time, the risk register should  
594 become the ordinary means of communicating risk information.

<sup>14</sup> Positive risks apply a similar process through which an enterprise asset considers an opportunity that takes advantage of a new or pre-existing condition that results in a positive impact (benefit) to the enterprise.

## 595 2.2.1 Inventory and Valuation of Assets

596 The first prerequisite for risk identification is the determination of enterprise assets that could be  
597 affected by risk (part A in Figure 6). Assets are not limited to technology; they include any  
598 resource that helps to achieve mission objectives (e.g., people, facilities, critical data, intellectual  
599 property, and services).<sup>15</sup>

600 Enterprises may benefit from applying a comprehensive method to inventory and monitor  
601 enterprise assets, such as the use of a *configuration management database (CMDB)* or an  
602 *information technology asset management (ITAM)* system. These management tools help to  
603 record and track the extent to which various assets contribute to the enterprise's mission. They  
604 can also help track enterprise resources throughout their own life cycle. For example, as the use  
605 of mobile devices (including personal devices) expands, there are commercial products that can  
606 help maintain inventory to support ongoing risk identification, analysis, and monitoring.

### 607 2.2.1.1 Business Impact Analysis

608 Risk managers can benefit by using a business impact analysis (BIA) process to consistently  
609 evaluate, record, and monitor the criticality and sensitivity of enterprise assets. A BIA can help  
610 document many aspects of the value of an asset that may extend well beyond replacement costs.  
611 For example, while one can calculate the direct cost of research and development underlying a  
612 new product offering, the long-term losses of the potential theft of that intellectual property  
613 could have more far-reaching impacts, including future revenue, share prices, enterprise  
614 reputation, and competitive advantage. That is among the reasons why it is beneficial to gain the  
615 guidance of senior leadership regarding the determination of assets that are critical or sensitive.  
616 The relative importance of each enterprise asset will be a necessary input for considering the  
617 impact portion of the Risk Description (part D) in the cybersecurity risk register. Considerations  
618 include:

- 619 • Would loss or theft of the resource compromise customer or enterprise private  
620 information?
- 621 • Would disclosure of an asset's information trigger legal or regulatory fines or actions?
- 622 • Would a lack of availability of the asset interrupt the enterprise's ability to fulfill its  
623 mission or result in costly downtime?
- 624 • Would the lack of confidentiality, integrity, or availability of the asset undermine public  
625 or consumer confidence or trust in the enterprise?
- 626 • Do internal or external critical resources depend on this asset to operate?

627 As the organization reviews the results of previous system-level categorization decisions and  
628 monitors risk assessment findings, practitioners can use that information to review system  
629 prioritization as an input into business impact analysis.

---

<sup>15</sup> NIST SP 800-37 Revision 2 points out that risk could impact "organizational operations (including mission, functions, image, or reputation), organizational assets, or individuals."

### 630 2.2.1.2 Determination of High-Value Assets

631 An example of asset valuation is the U.S. Government’s designation of “high-value assets,” or  
 632 HVAs. HVAs, described in OMB Memorandum M-19-03, represent agency resources that have  
 633 been determined as highly sensitive or critical to achieving the business mission [8]. OMB  
 634 M-19-03 represents an example of an enterprise approach to valuation since the memorandum  
 635 defines the specific categories for consistent designation (i.e., information value, role in Mission  
 636 Essential Function support, and role in support for Federal Civilian Essential Functions) yet  
 637 leaves permits each agency to determine which assets meet those criteria. Other common  
 638 industry examples include the use of specific classifications to reflect the sensitivity and  
 639 criticality of technology and information, including “Company Confidential” or “Business  
 640 Sensitive.”

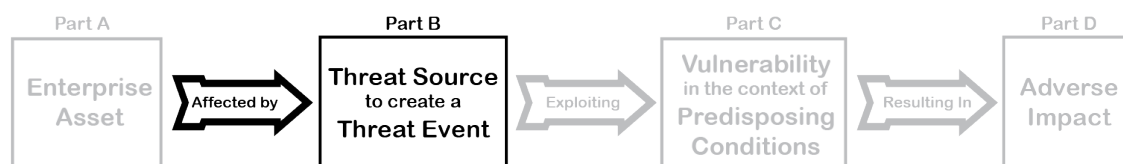
### 641 2.2.1.3 Automation Support for Inventory Accuracy

642 Accurate and complete asset inventory is an important element of CSRM, and the measurement  
 643 of that accuracy is often a key performance measurement for CSRM reporting. To illustrate that  
 644 importance, federal agencies, as part of their annual reporting metrics, must report how  
 645 completely their hardware and software asset management inventories reflect what is actually  
 646 installed on agency networks.

647 Automated tools can aid in discovering and monitoring various technical components used by  
 648 the enterprise. For example, a use case described by the NIST Security Content Automation  
 649 Protocol (SCAP) specification is *inventory scanning* (see Appendix B for more information).  
 650 Products that have been successfully reviewed as part of the SCAP Validation Program help  
 651 maintain a comprehensive and accurate inventory of digital assets [9]. Valuation information  
 652 recorded in that inventory, in turn, can help maintain a comprehensive view of the enterprise  
 653 assets for which cybersecurity risks should be identified, analyzed, treated, and monitored. The  
 654 use of automation helps to ensure that enterprise asset inventory is current, accurate, and  
 655 complete.

## 656 2.2.2 Determination of Potential Threats

657 The enumeration of potential threat sources and the threat events that those sources could initiate  
 658 is the second prerequisite for the identification of potential risk scenarios. Figure 7 represents  
 659 part B of the Risk Description cell of the CSRR. Because information and technology exist in  
 660 many forms, a broad approach to modeling threats supports comprehensive risk identification.



661

662

Figure 7: Threats as an Input to Risk Scenario Identification (Part B)



663 **2.2.2.1 Threat Enumeration**

664 Many public- and private-sector processes are available to help enumerate threats. One example  
 665 is the OCTAVE Allegro method from Carnegie Mellon University’s Software Engineering  
 666 Institute [10]. That model includes “identification of Areas of Concern,” a process for  
 667 determining the “possible conditions or situations that can threaten an organization’s information  
 668 asset(s).” The OCTAVE Allegro approach describes a process where risk managers create a tree  
 669 diagram of various threats based on:

- 670 • Human actors using technical means;
- 671 • Human actors using physical methods;
- 672 • Technical problems, such as hardware and software defects, malicious code (e.g.,  
 673 viruses), and other system-related problems; and
- 674 • Other problems that are outside of the control of an organization (e.g., natural disasters,  
 675 unavailability of critical infrastructures).

676 Enumeration of threats can be performed as a “top-down” analysis that considers important  
 677 assets that might be threatened or as a “bottom-up” analysis that considers what an unknown  
 678 threat might attempt to accomplish. Table 3 provides an example excerpt of a threat analysis.

679

**Table 3: Example Threat Modeling Analysis**

Source Type	Motivation	Threat Action	Assets Affected
Insider	Accidental, Intentional	Disclosure	Legal documents related to an upcoming merger, sales records, designs from the research & development division
Insider	Intentional	Disclosure	Physical files from Personnel Dept., physical design drawings from manufacturing
External	Accidental	Disclosure	Remote access account info for maintenance service staff
External	Intentional	Destruction	Student record database
External	Intentional	Disclosure	Patient medical records database (e.g., ransomware)
Software Defects	n/a	Modification	Financial transaction database (corruption)
Software Defects	n/a	Interruption	Financial transaction database (outage)
System Crashes	n/a	Interruption	Retail e-commerce site, Payroll processing system, manufacturing automation
Utility Outage	n/a	Disclosure	Enterprise network connections, e-commerce data center
Natural Disaster	n/a	Interruption	Enterprise network connections, e-commerce data center

680 Threat enumeration should consider potential motivation or intent. Accidental and intentional  
 681 threat activity can each have significant impacts, but the evaluation, treatment, and monitoring of  
 682 each type of activity will vary based on that motivation. Motivation will also have some bearing  
 683 on the likelihood calculation (as described in subsequent sections).

684 Note that the list above includes physical security considerations. Numerous physical issues  
 685 (e.g., theft, mechanical failures) can affect digital and logical devices, so both logical and  
 686 physical threat sources should be considered.

687 Practitioners consider various factors for each of these threat sources based on the understanding  
688 of valuable enterprise assets, as determined in Section 2.2.1. Example considerations include:

- 689 • What might a human actor accidentally disclose, modify, or destroy?
- 690 • What information or technology might a person (e.g., a disgruntled employee)  
691 *intentionally* disclose, interrupt, or delete?
- 692 • Are there threat conditions that might be introduced by supply chain partners, such as  
693 outside service providers?
- 694 • What similar considerations might apply to accidents or intentional actions from an  
695 outside source using technical means?
- 696 • What technical flaws or malicious code might affect valuable systems, leading to adverse  
697 impacts on enterprise objectives?
- 698 • What natural disasters or utility outages might have harmful effects?

699 Risk managers should develop a reasonable list of potential threats based on practical and  
700 imaginative scenarios, particularly in light of the assets identified in earlier processes. The extent  
701 of this list depends on the direction of senior leaders. While some stakeholders may prefer fewer  
702 risks in the register, it is important to remember that any risks that are not identified at this stage  
703 will not be part of the subsequent risk analysis and may introduce an unforeseen vulnerability.

#### 704 2.2.2.2 Reducing Unwanted Bias in Threat Considerations

705 While cybersecurity threat discussions often focus on the intentional and adversarial digital  
706 attack, it is important that all risk practitioners consider a broad array of threat sources and  
707 events. In addition, while highly unlikely scenarios might not need to be listed (e.g., a meteorite  
708 crashing into the data center), risk managers should avoid dismissing threats prematurely. For  
709 these reasons, practitioners will benefit from identifying and overcoming potential bias factors in  
710 enumerating potential threat sources and the events they might cause. Table 4 describes some of  
711 these bias issues as well as methods for addressing those issues.

712 **Table 4: Example Bias Issues to Avoid in Risk Management**

Bias Type	Description	Example	Countermeasure
<b>Overconfidence</b>	The tendency to be overly optimistic about either the potential benefits of an opportunity or the ability to handle a threat.	Notion that “our users are too smart to fall for a phishing attack.”	Detailed and realistic risk analysis (see Section 2.4) helps to evaluate the true probability of threats.
<b>Group Think</b>	A rationalized desire to miscalculate risk factors based on a desire for conformity with other members of a group or team.	A group member may not want to be the only one to express concern about a given threat or opportunity.	Use of individual input and subject matter expert judgement (e.g., Delphi Technique) helps avoid the risk that group-based threat discussions might discourage brainstorming.

<b>Following Trends</b>	Over- or under-valuation of threats due to irrational consideration of recent hype that can result in inappropriate risk response.	Assuming that <i>any</i> digital challenge can be addressed and solved through application of “machine learning” and “artificial intelligence.”	Staying informed about the details of current threat patterns. Combined with input from subject matter experts, this helps avoid “following the herd” to unreasonable conclusions.
<b>Availability</b>	Tendency to over-focus on opportunities or issues that come readily to mind because one has recently heard or read about them.	Concern that VPN confidentiality is insecure because quantum computing will make modern encryption obsolete and unreliable.	Detailed and realistic risk analysis (Section 2.3) helps to evaluate the true probability of threats.

713 **2.2.2.3 Threat Enumeration Through SWOT Analysis**

714 While it is critical that enterprises address potential negative impacts on mission and business  
 715 objectives, it is equally important (and required for federal agencies) that enterprises also plan  
 716 for success. OMB states in Circular A-123 that “the profile must identify sources of uncertainty,  
 717 both positive (opportunities) and negative (threats)” [6].

718 One method for identifying both potential positive and negative risks is through the use of a  
 719 SWOT (strength, weakness, opportunity, threat) analysis. Because effective risk management is  
 720 achieved by balancing potential benefits against negative consequences, a SWOT analysis  
 721 provides a visual method for considering these factors. Table 5 provides an example of an  
 722 overarching SWOT analysis. A similar exercise could be performed at any level of the  
 723 enterprise, including for an information system or cyber-physical system.

724 **Table 5: Example SWOT Analysis**

<p><b>Strengths</b></p> <p>Effective communication among a small office with co-located staff</p> <p>Online email and financial applications mean no local servers to support and protect</p> <p>Modernized office desktop equipment with current operating systems and connectivity</p>	<p><b>Weaknesses</b></p> <p>Few dedicated IT and Information Security employees</p> <p>Many endpoints are laptops that could be lost or stolen</p> <p>Office laptops do not employ full-disk encryption</p>
<p><b>Opportunities</b></p> <p>A newly awarded contract will significantly increase revenue and reputation</p> <p>Expansion of services into software development and remote administration services will enable company growth</p> <p>Funds have been allocated to improve cybersecurity improvement</p> <p>Third-party partners may be able to help us quickly ramp up new service offerings</p>	<p><b>Threats</b></p> <p>Visibility from contract announcement may cause adversaries to target the enterprise</p> <p>Information security requirements included in the terms &amp; conditions of the new contract increase the criticality of cybersecurity improvement</p> <p>Additional service offerings (e.g., development and remote administration) increase cybersecurity risks</p> <p>Supply chain partners may bring additional security risks to be considered and managed</p>

725 **2.2.2.4 Use of Gap Analysis to Identify Threats**

726 As part of the threat modeling exercise, practitioners can benefit from evaluating a comparison  
727 of current conditions to more desirable conditions, then analyzing any gaps between those to  
728 identify potential improvements. This process can be iterative in that the organization may not  
729 know the current state until after several rounds of risk management activities. Similarly,  
730 practitioners may not fully know the desired state until after several iterations of identifying,  
731 assessing, analyzing, and responding to risks. Despite this challenge, gap analysis can be a useful  
732 tool to include as part of a broad methodology.

733 NISTIR 8286 provides an example of the process described by the NIST Cybersecurity  
734 Framework [5]. This framework describes a set of activities that consider the five functions:

- 735 1. **Identify** what assets are important for achieving enterprise objectives.
- 736 2. **Protect** those assets from known threats and vulnerabilities.
- 737 3. **Detect** risk events on those assets in an efficient and effective manner.
- 738 4. **Respond** to such risk events rapidly and effectively.
- 739 5. **Recover** from any disruptions in accordance with enterprise strategy.

740 The framework decomposes the functions into categories, each of which is further described in  
741 strategic and tactical outcomes (subcategories.) For each subcategory, the framework  
742 recommends the creation of profile artifacts that document the *current* and *desired* (or target)  
743 policies, processes, and practices in each subcategory. By documenting the “as-is” outcomes,  
744 organizations can consider potential risk implications, including potential threat events. That  
745 information will later help to develop target state profiles. Table 6 provides an example excerpt  
746 from a current profile with example threat considerations.

747 **Table 6: Cybersecurity Framework Profiles Help Consider Threats**

ID	Category	Current State	Threat Consideration
ID.AM	Asset Management	<ul style="list-style-type: none"> <li>• Hardware and software are tracked, but inventory is not always accurate.</li> <li>• Network flows are not mapped.</li> <li>• Asset classification is performed and is effective.</li> <li>• Internal security roles are defined but not those of supply chain partners.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Internal user</b> (adds a non-compliant device; because a device is not in inventory, scans may miss it as a host so vulnerabilities may go undetected.)</li> <li>• <b>External adversary</b> (could gain network access and activities might not be distinguished from unmapped, typical traffic patterns.)</li> <li>• <b>External partner</b> (may not fulfill responsibilities for protecting, detecting, responding to incidents.)</li> </ul>
ID.BE	Business Environment	<ul style="list-style-type: none"> <li>• Priorities and responsibilities based on the Commercial Facilities Sector.</li> <li>• Dependencies and resilience requirements anecdotally understood but not more formally recorded.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Power failure</b> (causes customers [e.g., emergency services, hospitals] with critical dependencies to experience an extended loss of internet service due to lack of service level agreements and documented resilience requirements.)</li> </ul>

PR.AT	Awareness and Training	<ul style="list-style-type: none"> <li>All staff have been trained in physical and information security practices during onboarding.</li> </ul>	<ul style="list-style-type: none"> <li><b>Internal user</b> (may fall victim to an email phishing attack due to the lack of sufficient training.)</li> </ul>
PR.DS	Data Security	<ul style="list-style-type: none"> <li>Inbound and outbound remote connections are encrypted.</li> <li>Laptops with proprietary facility information do not have full-disk encryption.</li> <li>Email systems are configured to provide limited data loss prevention.</li> </ul>	<ul style="list-style-type: none"> <li><b>External adversary</b> (who has gained network access may quickly recognize and exfiltrate unencrypted, sensitive information in databases or within cleartext network traffic.)</li> <li><b>Internal user</b> (may unintentionally send sensitive records without encryption, while data loss prevention tools might impede that error.)</li> </ul>
DE.CM	Security Continuous Monitoring	<ul style="list-style-type: none"> <li>Physical security is monitored through cameras and access log reviews.</li> <li>Information security logs are aggregated and stored securely. Intrusion Detection products monitor for risks.</li> </ul>	<ul style="list-style-type: none"> <li><b>Internal User</b> (steals valuable equipment due to lack of diligent video and log monitoring.)</li> <li><b>External User</b> (is not quickly detected and thwarted due to ineffective monitoring.)</li> </ul>
RS.RP	Response Planning	<ul style="list-style-type: none"> <li>Response processes and procedures are executed and maintained.</li> <li>Supply chain partners have not been included in planning or exercises.</li> </ul>	<ul style="list-style-type: none"> <li><b>Supply Chain Partner</b> (is not able to provide the Security Operations Center with system log information and is unable to restore data to a known-good recovery point.)</li> </ul>
RC.RP	Recovery Planning	<ul style="list-style-type: none"> <li>Incident recovery processes are included in response plans.</li> <li>Lack of recovery objectives and metrics impedes ability to confirm that risks are treated in accordance with risk appetite and risk tolerance.</li> </ul>	<ul style="list-style-type: none"> <li><b>Software failure</b> (could cause an outage in an essential business application that exceeds organizational directives regarding maximum tolerable downtime.)</li> </ul>

748 Another source of ideas for threat modeling is NIST SP 800-53, *Security and Privacy Controls*  
749 *for Information Systems and Organizations*, which provides a catalog of security and privacy  
750 controls.<sup>16</sup> A companion document, SP 800-53A, *Assessing Security and Privacy Controls in*  
751 *Federal Information Systems and Organizations: Building Effective Assessment Plans*,  
752 documents methods for assessing the effectiveness and suitability of those controls for various  
753 purposes [12]. Through the examination of controls and assessment methods, practitioners can  
754 observe conditions that align with enterprise situations, sparking discussions about potential  
755 threats. For example:

756 A practitioner can consider control AC-17, Remote Access, which states, “The use of  
757 encrypted VPNs provides sufficient assurance to the organization that it can effectively  
758 treat such connections as internal networks if the cryptographic mechanisms used are  
759 implemented in accordance with applicable laws, executive orders, directives,  
760 regulations, policies, standards, and guidelines.” The practitioner should then consider the

<sup>16</sup> NIST provides a set of Online Informative References Validation Tool and Focal Document Templates, including those for SP 800-53, that assist with aligning and comparing various information security models. The templates are available at: <https://www.nist.gov/cyberframework/informative-references/validation-tool-templates>.

761 threat conditions that would make encryption necessary (e.g., preventing eavesdropping,  
762 ensuring authorization) and perhaps identify regulatory compliance requirements.

763 Considering controls and their assessments can inspire the imagination and support effective  
764 threat modeling.

765 As noted in NISTIR 8286, “organizations should not wait until the risk register is completed  
766 before addressing obvious issues,” such as those issues that arise from the threat modeling  
767 exercises. CSRM practitioners, in collaboration with ERM stakeholders, will need to continually  
768 define and refine the timing of various risk identification processes. An organization that delays  
769 risk management until the end of a detailed and exhaustive risk identification activity may find  
770 that many risks become realized while the practitioners are still working. At the other extreme,  
771 immediately beginning risk management when only a few risks have been catalogued can  
772 hamper prioritization or cause a continual recalculation of risk importance as new loss event  
773 types are identified and added. Threat identification methods may also discover quick wins (e.g.,  
774 changing default passwords for devices and applications, enabling cryptography settings, locking  
775 file cabinets) that can be efficiently resolved, immediately addressed, and documented in the risk  
776 register while other risk identification activities continue.

#### 777 **2.2.2.5 Technical Threat Enumeration**

778 While threat sources include many factors, because cybersecurity risks are so closely associated  
779 with information and technology, technical threats are likely to comprise the majority of those  
780 enumerated. The complexity and rapid evolution of technical threats make it particularly  
781 worthwhile to gain insights from reputable partners regarding how to prepare for, recognize, and  
782 respond to these threat sources.

783 For the enterprise to be successful in protecting information and technology, and for it to rapidly  
784 detect, respond, and recover from threat events quickly, the organization may choose to apply an  
785 intelligence-driven approach, commonly referenced as Cyber Threat Intelligence (CTI). Using  
786 sources of information and data such as those described in Table 7, practitioners will gain  
787 insights into adversaries’ tactics, techniques, and procedures (TTPs) as well as other information  
788 about how to prepare and for what conditions to monitor.

789 Industry-based threat intelligence sharing organizations are available for the exchange of CTI  
790 among members or subscribers. For example, DoD’s Information Sharing Environment (DISCE)  
791 is a government sharing program that facilitates CTI sharing between its Defense Industrial Base  
792 (DIB) members and participants. Another example is that of information sharing analysis centers  
793 (ISACs) and organizations (ISAOs). Using intelligence provided by such sources, risk  
794 practitioners can make threat-informed decisions regarding defensive capabilities, threat  
795 detection techniques, and mitigation strategies. By correlating and analyzing cyber threat



796 information from multiple sources, an organization can also enrich existing information and  
797 make it more actionable.<sup>17</sup>

798

**Table 7: Example Sources of Threat Information**

Commercial Threat Intelligence sources	<p>Various commercial organizations provide subscription-based services that supply enterprise intelligence regarding potential threat actors and events. Often these intelligence providers maintain an understanding of enterprise asset types; the commercial provider then provides information about what actions specific threat sources have conducted against similar assets elsewhere.</p> <p>Gartner Inc. Reviews for Security Threat Intelligence Products and Services <a href="https://www.gartner.com/reviews/market/security-threat-intelligence-services">https://www.gartner.com/reviews/market/security-threat-intelligence-services</a></p>
Automated Indicator Sharing (AIS) feeds	<p>Both public- and private-sector organizations (e.g., DHS, Financial Sector Information Sharing and Analysis Center [FS-ISAC]) provide automated data feeds with information about existing or imminent threats, and vulnerabilities being exploited by those threats.</p> <p>Example: DHS Cybersecurity and Infrastructure Security Agency (CISA) <a href="https://us-cert.cisa.gov/ais">https://us-cert.cisa.gov/ais</a>, <a href="https://www.cisa.gov/ciscp">https://www.cisa.gov/ciscp</a></p>
Information Sharing and Analysis Centers and Organizations (ISACs and ISAOs)	<p>Many industry types, including critical infrastructure sectors, experience sector-specific threat types. Information Sharing and Analysis Centers (ISACs) provide members with support and information to help conduct risk assessment and maintain risk awareness. Some ISACs offer in-house applications for sharing of indicators of compromise (IoC) and other threat-based alerts.</p> <p>Example: National Council of ISACs (<a href="https://www.nationalisacs.org/">https://www.nationalisacs.org/</a>)</p>
Technical Threat Category Models	<p>Many industry models are available for performing technical threat modeling, particularly in software development context. Like the threat trees described in Section 2.2.2, such models help guide collaboration and brainstorming activities to consider what-if scenarios including threats, vulnerabilities, and their impact.</p>
MITRE ATT&CK <sup>®</sup>	<p>Knowledge base of adversary tactics and techniques based on real-world observations. Used as a foundation for development of specific threat models and methods, helping enterprise risk practitioners to consider the threat conditions that an adversary might apply and the events that adversary might seek to cause. Recent addition of pre-attack indicators and methods can help prepare for and detect signs of an impending event.</p> <p><a href="https://attack.mitre.org/">https://attack.mitre.org/</a></p>
NSA/CSS Technical Cyber Threat Framework (NTCTF) v2	<p>While this model does not help identify sources, it provides a broad listing of the types of events a threat source might attempt to initiate, particularly a motivated human adversary. By defining actions such an adversary might desire to perform, the NTCTF supports an imaginative approach to enterprise threat modeling.</p> <p><a href="https://www.nsa.gov/Portals/70/documents/what-we-do/cybersecurity/professional-resources/ctr-nsa-css-technical-cyber-threat-framework.pdf">https://www.nsa.gov/Portals/70/documents/what-we-do/cybersecurity/professional-resources/ctr-nsa-css-technical-cyber-threat-framework.pdf</a></p>

799 By understanding typical attack patterns, enterprises can mount defenses to improve resilience.  
800 For example, understanding the methods of various attackers in privilege escalation or lateral  
801 movement will help risk managers plan effective preventive and detective controls. Because  
802 technical attacks can move rapidly, preparation is paramount. Updated, rapid sharing of indicators

<sup>17</sup> Cybersecurity information sharing is discussed in detail in NIST SP 800-150, *Guide to Cyber Threat Information Sharing*, <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-150.pdf>

803 of compromise (such as those provided through Structured Threat Information Expression  
804 [STIX]) helps enterprise practitioners better detect and respond to emerging threats.<sup>18</sup>

805 Because of the time-critical nature of cybersecurity risks, introducing automation into the threat  
806 intelligence analysis enables an enterprise to reduce the potential delays and errors that a human-  
807 only approach can introduce. While automated information sharing will not entirely eliminate  
808 threats, it can help an organization stay aware of and prepared for new or evolving types of  
809 attacks. One example of an AIS is that offered by the U.S. Department of Homeland Security  
810 (DHS) in accordance with the U.S. Cybersecurity Information Sharing Act of 2015. The DHS  
811 AIS site includes the following information:

812 The free (DHS) AIS capability enables the exchange of cyber threat indicators between  
813 the Federal government and the private sector at machine speed. Threat indicators are  
814 pieces of information like malicious IP addresses or the sender address of a phishing  
815 email (although they can also be much more complicated).

816 AIS participants connect to a DHS-managed system in the Department's National  
817 Cybersecurity and Communications Integration Center (NCCIC) that allows  
818 bidirectional sharing of cyber threat indicators. A server housed at each participant's  
819 location allows them to exchange indicators with the NCCIC. Participants will not only  
820 receive DHS-developed indicators but can share indicators they have observed in their  
821 own network defense efforts, which DHS will then share back out to all AIS  
822 participants.<sup>19</sup>

823 An analysis of network packet capture data can help identify potential threats based on observed  
824 traffic. Armed with understanding from CTI sources regarding TTPs and IoCs, practitioners will  
825 be able to observe potential indicators and likely attack paths. In conjunction with past and  
826 existing cyber incident information, organizations can use CTI to support internal risk  
827 communication and risk analysis and to improve risk scenario development. In addition to the  
828 technical advisories, the alerts and analysis reports at the DHS National Cyber Alert System  
829 provide information about recent TTPs and how they have affected various enterprises.

### 830 **2.2.3 Vulnerability Identification**

831 For any of the various threat conditions described above to result in an impactful risk, each needs  
832 a vulnerable or predisposing condition that can be exploited. The identification of vulnerabilities  
833 or conditions that a threat source would use to cause impact is an important component of risk  
834 identification and represents part C (Figure 8) of the CSRM risk scenario.

---

<sup>18</sup> STIX is one of several data exchange specifications for cybersecurity information sharing. More information is available at:  
<https://oasis-open.github.io/cti-documentation>

<sup>19</sup> The NCCIC is part of the Cyber Information Sharing and Collaboration Program (CISCP), available at:  
<https://www.cisa.gov/ciscp>





835

836

**Figure 8: Vulnerability Inputs to Risk Scenario Identification (Part C)**

837

### 2.2.3.1 Determination of Vulnerabilities and Predisposing Conditions

838 While it is necessary to review threats and vulnerabilities as unique elements, they are often  
 839 considered at the same time. Many organizations will consider a given loss scenario and evaluate  
 840 both, “What threat sources might initiate which threat events?” and “What vulnerabilities or  
 841 predisposing conditions might those threat sources exploit to cause a loss event?”<sup>20</sup> Much of the  
 842 information provided through CTI will also inform understanding of vulnerability. For example,  
 843 analysis of the infamous 2017 WannaCry ransomware attack includes understanding of the threat  
 844 source and motive (a known and capable cybercrime group seeking financial gain), the intended  
 845 threat event (deliberate modification, interruption, and potential destruction of key enterprise  
 846 information assets), and the vulnerability to be exploited by the adversary (CVE-2017-0144).

847 Practitioners should (within the scope agreed upon in activities described in Section 2.1)  
 848 systematically consider the potential physical and logical vulnerabilities and predisposing  
 849 conditions that can be exploited by a threat source. This consideration can be facilitated through  
 850 many of the methods described in Table 7, including:

- 851 • Use of commercial intelligence sources that provide threat and vulnerability information.  
 852 Many providers will take note of a customer’s enterprise information and technology  
 853 (e.g., hardware, software, and operating systems in use) to alert the organization to any  
 854 vulnerabilities in those platforms that are known to be targeted by existing threat sources.
- 855 • Integration of AIS feeds that may include automated alerts regarding known  
 856 vulnerabilities. Many security incident event monitoring (SIEM) products and intrusion  
 857 detection systems (IDS) are able to help enterprises associate asset inventory information  
 858 with AIS alerts to support incident reporting and monitoring.
- 859 • Use of a threat tree model (e.g., the diagram in the OCTAVE ALLEGRO guidance) to  
 860 consider various human factors, technical defects, software flaws, physical entry points,  
 861 utility dependencies, and supply chain vulnerabilities that present vulnerabilities.
- 862 • A review of the various threat categorization models (e.g., MITRE ATT&CK<sup>®</sup>) can inspire  
 863 internal discussions, such as “What vulnerabilities might enable execution of malicious  
 864 code?” or “What predisposing conditions foster lateral movement within the enterprise?”

<sup>20</sup> There are many similarities among the threat identification and vulnerability identification activities. These may seem redundant, but it is important to understand both the sources of potential harm (threats) and the conditions that those threat sources might exploit (vulnerabilities).

865 As with threat modeling, practitioners will also benefit from applying known risk management  
866 frameworks as a tool for vulnerability discovery. For example, a review of the controls catalog in  
867 SP 800-53 may lead to consideration of control MP-3, Media Marking, which can then inspire  
868 discussion regarding potential vulnerabilities that might result from unmarked (or improperly  
869 marked) system media.

870 Notably, the enterprise will benefit from the advice of external specialists with expertise in  
871 identifying and categorizing various types of vulnerabilities. Some entities, such as those  
872 operating moderate- and high-impact federal information systems, require formal penetration  
873 testing to identify potential vulnerabilities and the exploitability of those conditions. In addition  
874 to some government and law enforcement agencies that are able to assist enterprises with  
875 evaluating physical and technical vulnerabilities, many commercial organizations offer these  
876 services.

### 877 **2.2.3.2 System Complexity as a Vulnerability**

878 NISTIR 8286 states that additional risks can result from the dynamic complexity of enterprise  
879 information and technology. In fact, that complexity is itself a vulnerability to be considered and  
880 documented. Evaluation of “what-if” scenarios regarding potential vulnerabilities, especially  
881 those affecting critical assets, should include the determination of critical dependencies on other  
882 resources. Because risk identification and risk analysis are iterative, risk analysis methods (such  
883 as the Event Tree Analysis described in Section 2.3.2.2) will help determine those dependencies.  
884 Having made that determination, those critical dependencies can be recorded in the BIA  
885 (described in Section 2.2.1.1). Risk identification then includes scenario discussions that evaluate  
886 complex or cascading events as vulnerabilities to be identified.

887 For example, the 2003 Northeast Power Grid interruption demonstrated how several moderate  
888 risk events cascaded into a national emergency. Another example of systemic risk is that of some  
889 financial institutions that were impacted by cascading risk in 2008. In this case, large enterprises  
890 experienced catastrophic events because they had interdependencies with other banks, insurance  
891 companies, and customers. When identifying and recording risks in the register, such emerging  
892 risk conditions created by the interdependence of systems and counterparty risk must also be  
893 identified, tracked, and managed using the same methods described for more straightforward  
894 scenarios.

895 As with other CSRM components, vulnerability identification can be considered through either  
896 qualitative or quantitative means. An organization might determine it “has a large number of  
897 high severity vulnerabilities” based on an internal review. A qualitative review might result from  
898 a gap analysis between NIST Cybersecurity Framework Current State and Target State profiles  
899 since such an analysis is intended to foster discussion and communication regarding risks but  
900 will not likely produce a highly specific quantitative result.

901 More quantitative vulnerability identification results from a formal testing approach that  
902 examines a discrete set of enterprise resources for a specified set of known vulnerabilities.  
903 Particular vulnerability assessments (e.g., software code review or simulated phishing attack) can

904 provide quantitative results. Results of a formal assessment might include a specific number of  
905 identified issues, which can be used to help complete the likelihood column of the risk register.

### 906 **2.2.3.3 Vulnerability Identification Automation**

907 The complexity and interconnection of technology results in many thousands of potential  
908 vulnerabilities. Because of this broad scale, combined with a rapidly evolving technical  
909 landscape, automation can improve the enterprise's ability to manage relevant vulnerabilities.  
910 Automation also enables a more timely monitoring of risk as well as adaptation to changing risk  
911 scenarios.

912 Hardware and software products are a significant source of vulnerability for any enterprise,  
913 whether through inherent flaws in those products or through errors in product implementation or  
914 application. To help support the consistent identification and monitoring of these vulnerabilities,  
915 security organizations have developed broad clearinghouses of vulnerability information. For  
916 example, NIST operates the National Vulnerability Database (NVD) and the National Checklist  
917 Program (NCP) to support vulnerability and security configuration management via catalogs of:

- 918 • Configuration checklists for securing key information technologies;
- 919 • Information about secure configuration settings (with associated SP 800-53 security  
920 controls);
- 921 • Vulnerabilities (with associated severity scores);
- 922 • Standardized security checklists for automated security configuration scanning (e.g.,  
923 security checklists in Security Content Automation Protocol format<sup>21</sup>); and
- 924 • Products that use standards to identify and report vulnerabilities.

925 Automated data feeds, such as those described above, enable enterprise monitoring tools to  
926 ingest information about known vulnerabilities in near-real-time and compare those with the  
927 asset inventory. A key factor in that data feed is information regarding the date that a  
928 vulnerability was publicly disclosed. The severity of a given vulnerability increases  
929 exponentially after it becomes publicly known, so it is important that practitioners prioritize  
930 remediation of flaws. The risk of the vulnerability must be balanced with the risk of  
931 implementing a fix for that issue too quickly. Automated tools can help monitor and maintain  
932 that balance through specific reports regarding severe vulnerabilities that have not been patched  
933 within a reasonable time. An example of this is the DHS AWARE (Agency-Wide Adaptive Risk  
934 Enumeration) scoring methodology used by the DHS Continuous Diagnostics and Mitigation  
935 (CDM) risk management dashboard. AWARE is not intended to identify all issues, but the  
936 scoring methodology helps to highlight and prioritize cybersecurity risks that are likely to exceed  
937 allowable risk tolerance (e.g., known software vulnerabilities on critical assets that are not  
938 mitigated within a designated grace period).<sup>22</sup>

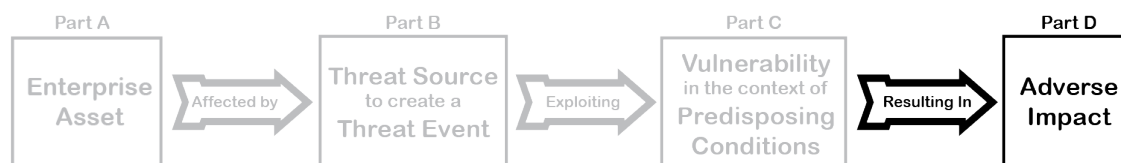
---

<sup>21</sup> Information about the NIST SCAP is available at <https://csrc.nist.gov/projects/security-content-automation-protocol/>

<sup>22</sup> More information about the DHS AWARE scoring method is available from: <https://www.cisa.gov/cdm-training>

939 **2.2.4 Determining Potential Impact**

940 The final prerequisite for creating a practical list of risk scenarios for the risk register is the  
941 determination of the potential impact of the threats and vulnerabilities described above. The  
942 section below describes the completion of part D of the CSRM Risk Description column (Figure  
943 9.)



944

945

**Figure 9: Adverse Impact Inclusion in Risk Scenario Identification (Part D)**

946 Discovery activities throughout Section 2.2 may have already highlighted potential adverse  
947 impacts to explore. Description of the impact is a key element for enterprise stakeholders and  
948 represents the connection between cybersecurity risks and the enterprise objectives that would be  
949 affected by those risks. Reviewing the key enterprise objectives, as identified in scoping, and  
950 armed with a broad list of potential threats and vulnerabilities, personnel can develop a list of  
951 realistic scenarios.

952 While some types of impact may not be immediately apparent, the long-term effects can be  
953 significant. For example, consider a situation where a criminal has gained unauthorized access to  
954 an enterprise system and has exfiltrated a large amount of confidential data. If that criminal is  
955 cautious, there may not be any disruption of operations. In fact, sometimes cyber criminals  
956 actually try to *improve* the health of a victim's technology to ensure that it will be available for  
957 their malicious activity. In this case, the system may seem to be working fine—even better than  
958 ever—and then later, the enterprise realizes that a catastrophic loss has occurred.

959 Notably, impact scenarios can be considered in light of a continuum rather than as a binary state.  
960 Many impacts will cause mission degradation or reduced performance and may not exhibit  
961 themselves as a full interruption of service or capability. This consideration should be factored  
962 into risk prioritization and analysis.

963 Risk scenarios should be assessed in terms of both initial impact and downstream consequences.  
964 Factors to consider include:

- 965
- 966 • Primary impact – the initial impact following a negative cybersecurity event, such as the  
967 downtime when a website is unavailable to customers
  - 968 • Secondary impact – A loss event that occurs subsequent to the primary impact as a  
downstream or cascading impact to the enterprise

969 For example, consider a large enterprise that experiences a breach of confidential customer data.  
970 In this example, an external attacker with criminal intent might attack a highly critical and  
971 sensitive customer database through a software vulnerability in the internet-facing website. The  
972 initial impact may be minimal since exfiltration is not disruptive, and the company may not even

973 detect an issue. Once the problem has been discovered, there may be primary impact, such as:

- 974 • Cost of a focused investigation into the breach
- 975 • Price of restitution for customer losses (e.g., credit monitoring services)
- 976 • The expense of third-party specialists to provide forensic expertise and to ensure
- 977 adequate mitigation of the cybersecurity incident
- 978 • Cost of immediate capital investment to address cybersecurity issues that contributed to
- 979 the breach

980 Long-term or secondary effects may be more impactful. They can include:

- 981 • Loss of market share due to eroded trust in the company’s reputation
- 982 • Revenue losses from organizations that choose not to renew contracts
- 983 • Fines and penalties from regulators

984 When considering the impact component of risk scenarios, it is important to consider the  
 985 frequency of potential consequences. A risk event of moderate impact that occurs weekly may,  
 986 over time, represent a higher risk than that of a major event that occurs infrequently. Such  
 987 temporal factors may be valuable for stakeholders’ understanding and reporting of risks. For  
 988 example, senior leaders may wish to see the impact of a risk expressed as the loss for each  
 989 occurrence (the *single loss expectancy*, or *SLE*), or they might prefer to see the total loss for that  
 990 risk over an annual period (the *annualized loss expectancy*, or *ALE*). Consistent documentation  
 991 of impact frequency is also important for supporting the integration and aggregation of risk  
 992 registers.

993 As with other risk components, impact considerations may be either qualitative or quantitative,  
 994 as illustrated by the examples in Table 8.

995 **Table 8: Example Negative and Positive Impact Scenarios**

Description of negative consequences (qualitative)	A software flaw results in a significant issue with the integrity of enterprise financial systems, necessitating a major outage and extended rework to validate existing records and verify proper operation.
Description of negative consequences (quantitative)	A ransomware attack has performed unauthorized encryption of 112,000 patient records; remediation and repair of the affected health information system are likely to disrupt operations for 48 hours resulting in a \$1.14 million primary loss.
Description of positive impact (qualitative)	New machine learning technology would significantly increase the throughput of the enterprise research team and could lead to expansion into new marketing areas.
Description of positive impact (quantitative)	The addition of high-availability services for the enterprise web server will improve availability from 93.4% to 99.1% over the next year and will also improve market share by 3% due to improved customer satisfaction and resulting reviews.

996 **2.2.5 Recording Identified Risks**

997 Using the four elements described in earlier subsections (i.e., key assets, threats, vulnerabilities,  
998 and impacts), practitioners can record relevant cybersecurity risks in the risk register.

ID	Priority	Risk Description	Risk Category	Current Assessment		
				Likelihood	Impact	Exposure Rating
1	TBD	External criminal attacker exploits a software vulnerability in the internet-facing customer data site, resulting in "significant" customer confidential data exfiltration with revenue, reputation, and regulatory implications.				
2	TBD	A flood event enters the first-floor data center, causing water damage to several critical servers and interrupting service to more than 10% of customers.				

999  
1000

**Figure 10: Example Risk Register with Sample Risk Descriptions**

1001 The use of detailed risk scenarios helps ensure that all understand the risks being considered and  
1002 the impacts on organizational objectives. The risk description need not be exhaustive but should  
1003 include sufficient information to support subsequent analysis, evaluation, treatment, and  
1004 monitoring. An example risk description based on the data breach illustration above might say:

1005           External criminal attacker exploits a software vulnerability in the internet-  
1006           facing customer data site, resulting in "significant" customer confidential data  
1007           exfiltration with revenue, reputation, and regulatory implications.

1008 In support of ERM, practitioners need to continually balance an understanding of what mission  
1009 objectives can be affected by various threats (a top-down consideration) and how various threats  
1010 can impact enterprise objectives (a bottom-up consideration). Both sets of conditions are  
1011 continually changing, so CSRM is an iterative activity of ongoing discovery, communication,  
1012 response, and monitoring. CSRM itself is conducted as part of a broader ERM life cycle. In  
1013 addition to the known risks that are already being monitored, there may also be developing or  
1014 *emergent risks* that are yet to be fully defined but might disrupt enterprise objectives in the  
1015 future.

1016 Each of the activities in Section 2.2 is iterative and supports the top-down/bottom-up approach  
1017 described above. An initial list of scenarios can be developed and used to consider threats and  
1018 vulnerabilities. As threats and vulnerabilities are explored, those might lead to the discovery of  
1019 additional risk scenarios to be considered. This iterative process can be adjusted and tailored to  
1020 develop and maintain a practical and manageable set of risks.

1021 As an example, consider some high-value assets that are important to a local hospital and issues  
1022 that could jeopardize those assets. Some top-down considerations may include:

- 1023
- 1024
- 1025
- 1026
- 1027
- 1028
- 1029
- 1030
- 1031
- 1032
- Patient record database – a ransomware attack could encrypt critical records; a network outage could disrupt availability; an authentication issue could hamper the ability to log in; a software upgrade could inadvertently corrupt the data.
  - Pharmaceutical system provided by a third party – a malicious (or tricked) insider could alter pharmacy records, resulting in the incorrect medication being given to a patient; the malicious external party could break in and disclose or destroy pharmacy records; a construction incident could sever network communications to the service.
  - Point of care (PoC) terminals – authentication system failure could disrupt the ability to provide patient care; user data error could result in inaccurate and potentially unsafe patient conditions; an improperly tested software patch could render terminals unusable.

1033 Bottom-up considerations would start with threats and vulnerabilities and consider where those  
1034 can lead:

- 1035
- 1036
- 1037
- 1038
- 1039
- 1040
- 1041
- 1042
- 1043
- 1044
- 1045
- 1046
- 1047
- Ransomware attack through a social engineering attack (e.g., web-based malware drive-by attack, email phishing attack) – Attack could render many systems unreadable, including patient care databases, pharmacy records, billing systems, and payroll.
  - Network outage due to a firewall malfunction – An internal failure of a major switch or router could result in localized failures of PoC terminals, patient in-processing, and medical care services (e.g., review of radiology reports). External connectivity failure would disrupt electronic mail, clinical professional services, pharmaceutical processing, some laboratory results.
  - Physical hardware malfunction through a failed component – risk technical equipment (e.g., televisions) could be rendered unavailable with few consequences. -risk technology (e.g., patient scanners) malfunctions could fail to provide timely and accurate patient results. Awaiting replacement systems could lead to potential injuries (e.g., through fire or electrical shock) or delays in patient care.

1048 Thorough risk identification in realistic, and mission-oriented scenarios help to communicate the  
1049 connection between various uncertainties and the mission objectives that might be affected.

## 1050 **2.2.6 Risk Categorization**

1051 Each risk in the CSRR should also indicate the relevant risk category (indicated by the yellow  
1052 dashed box in Figure 11) based on the risk strategy guidance described in Section 2.1. Categories  
1053 could be any taxonomy that helps aggregate risk information and supports the integration of  
1054 cybersecurity risk registers for ERM decision support. Example risk categories include:

- 1055
- 1056
- 1057
- 1058
- 1059
- Risk framework groupings, such as NIST RMF families (e.g., Access Control, Supply Chain Risk Management)
  - Threat types, such as intentional disclosures, unintended modifications, system failures, or natural disasters
  - Impact considerations based on business units affected or information systems impacted



1060 Consistent risk categorization supports effective integration of cybersecurity risks throughout the  
 1061 enterprise and aggregation into an enterprise cybersecurity risk register. That information  
 1062 ultimately becomes part of the overall Enterprise Risk Register and the Enterprise Risk Profile.

1063 **2.3 Detailed Risk Analysis**

The table is titled "Notional Cybersecurity Risk Register". It has 11 columns: ID, Priority, Risk Description, Risk Category, Current Assessment (subdivided into Likelihood, Impact, and Exposure Rating), Risk Response Type, Risk Response Cost, Risk Response Description, Risk Owner, and Status. There are five rows numbered 1 to 5. A dashed yellow box highlights the Risk Category column, and a solid red box highlights the Current Assessment sub-columns (Likelihood, Impact, and Exposure Rating). A footer bar at the bottom of the table contains the text "Continually Communicate, Learn, and Update".

Notional Cybersecurity Risk Register											
ID	Priority	Risk Description	Risk Category	Current Assessment			Risk Response Type	Risk Response Cost	Risk Response Description	Risk Owner	Status
				Likelihood	Impact	Exposure Rating					
1											
2											
3											
4											
5											

1064

1065 **Figure 11: CSRR Highlighting Risk Category and Current Assessment Columns**

1066 Risk analysis enables to determination of the likelihood of impact and priority of treatment. This  
 1067 section helps to complete the likelihood and impact columns of the cybersecurity risk register  
 1068 and the exposure column that represents the product of those two values. These columns are  
 1069 illustrated by the solid red box in Figure 11.

1070 Because cybersecurity risk reflects the effect of uncertainty on or within a digital component that  
 1071 supports enterprise objectives, risk analysis helps to measure both the level of uncertainty  
 1072 entailed by the risk scenario and the extent of the uncertain effect upon enterprise objectives.  
 1073 Deterministic models can provide a detailed analysis of likelihood and impact where sufficient  
 1074 information is available for such a determination. In other cases, the randomness of uncertainty  
 1075 and the many factors involved in complex information and technology better support a  
 1076 probabilistic (or stochastic) methodology.

1077 **2.3.1 Selecting Risk Analysis Methodologies**

1078 International Electrotechnical Commission (IEC) standard 31010:2019, *Risk management —*  
 1079 *Risk assessment techniques*, states, “In deciding whether a qualitative or quantitative technique is  
 1080 more appropriate, the main criteria to consider are the form of output of most use to stakeholders  
 1081 and the availability and reliability of data. Quantitative techniques generally require high quality  
 1082 data if they are to provide meaningful results. However, in some cases where data is not  
 1083 sufficient, the rigor needed to apply a quantitative technique can provide an improved  
 1084 understanding of the risk, even though the result of the calculation might be uncertain” [13].  
 1085 Note that multiple methodologies can be used, based on enterprise strategy, organization  
 1086 preference, and data availability.



1087 Regardless of the methodologies being applied, it is important to consider as many data points as  
1088 needed to render a judgement regarding likelihood and impact values. Unfortunately, without  
1089 supporting data, well-intentioned but misguided methods of risk analysis amount to little more  
1090 than a guess. In many cases, the application of even a moderate amount of deductive reasoning,  
1091 combined with various analysis techniques, can render a more accurate and reliable risk analysis.  
1092 Quantitatively informed qualitative decision-making should be the objective in the absence of  
1093 purely quantitative-driven decisions.

1094 Analysis considerations are often provided in a qualitative way, such as, “The patient database is  
1095 at high risk of unauthorized disclosure because we have learned that hackers are targeting health  
1096 information systems with ransomware, and we have determined that there are numerous  
1097 vulnerabilities in our health information system.”

1098 In other cases, the analysis can be quantitative, such as in the example below:

1099 The health information system contains about 12,000 records. A successful ransomware  
1100 breach could cost approximately \$1.3M if the data is destroyed or \$2.5M dollars if the  
1101 breach results in a disclosure. We know that the Arctic Zebra APT team has been  
1102 targeting similar databases; through our understanding of their techniques and those of  
1103 others, we believe that there is a 70 % chance they will target us and a 30 % chance  
1104 (based on internal testing and network scans) that it would be successful. Based on that  
1105 data, we believe that there is a 21 % chance of single loss exposure, or between \$273,000  
1106 and \$525,000. This exposure calculation does not consider additional secondary losses,  
1107 such as lost revenue due to customer erosion from loss of trust or personal lawsuits  
1108 against the firm.

1109 Each of these methodologies provides value for the enterprise, and the technique selection should  
1110 be tailored based on the context and the strategic guidance provided by governance stakeholders.  
1111 The choice is often driven by the intended outcome and the amount of detailed information  
1112 available.

1113 When selecting a risk assessment technique, organizations should consider the costs of analysis  
1114 in light of the desired outcome to help determine the most cost-effective technique. An  
1115 inexpensive but accurate qualitative analysis that identifies the most risks and leads to mitigating  
1116 those risks to the best possible degree may be the right move for a particular organization. For  
1117 others, a highly detailed quantitative risk assessment may require more resources than a  
1118 qualitative approach but may also provide specific and actionable information that helps to focus  
1119 attention on important threat scenarios.

### 1120 **2.3.2 Techniques for Estimating Likelihood and Impact**

1121 NISTIR 8286 highlights the need for improved risk analysis when estimating and recording the  
1122 likelihood and impact of cybersecurity events and monitoring to assure that risks remain within  
1123 acceptable parameters.<sup>23</sup> To improve enterprise risk estimation accuracy and consistency, CSRM  
1124 practitioners are encouraged to explore the use of tools and processes that support measurable  
1125 and meaningful risk analysis and reporting.

1126 Some analysis techniques are based on estimates from subject matter experts' (SMEs) experience  
1127 and knowledge. Some methods, such as this SME estimation, can be subjective. Other methods  
1128 are more objective and based on analytical considerations, statistical analysis, and scenario  
1129 modeling, as well as potentially drawing on knowledge of previous events.

1130 Understanding the intended purpose of the analysis can help one decide which techniques to use.  
1131 For example, a detailed and quantified approach may be valuable as a basis for a comprehensive  
1132 review or update of the enterprise cybersecurity approach. Detailed evaluation helps to reinforce  
1133 defense measures and increase resilience, as in the following example:

1134 Enterprise leaders have learned through an InfraGard alert that there is a high  
1135 probability that companies in its sector will be targeted by a particular APT group.  
1136 Because internal cybersecurity risk managers have performed threat modeling based  
1137 on the MITRE Adversarial Tactics, Techniques, and Common Knowledge  
1138 (ATT&CK®) and Pre-ATT&CK frameworks, the company was able to quickly  
1139 consider high-value assets that would most likely be at risk.

1140 A key tactic, technique, or procedure (TTP) of this attack is through "password  
1141 spraying" brute force login attempts. It is known that several critical systems have not  
1142 yet been updated to support multi-factor authentication and would be vulnerable to  
1143 such an attack. A poll of the security leaders in the organization (using a Delphi  
1144 exercise) determined that there is a 50-70 % chance that the payroll system will be  
1145 attacked (the mean value was 60 %). A successful attack on that system would have a  
1146 direct and indirect financial impact of between \$1.7M and \$2.4M US with the most  
1147 likely impact being \$2.0M. Therefore, the risk exposure value for this row of the risk  
1148 register was established at \$1.2M (based on .6 x \$2M).

1149 Notably, the example above provides several ranges of estimates. Some industry specialists have  
1150 indicated that a range of possible values is more helpful and likely more accurate than a single  
1151 "point estimate." Additionally, while this example uses the mean values of those ranges to  
1152 identify the likelihood and the potential impact, the ranges themselves are often recorded in the  
1153 risk register. In this instance, given a possible impact of "between \$1.7M and \$2.4M," the  
1154 exposure may have been presented as "\$1.02M to \$1.44M."

---

<sup>23</sup> It is the intention of this document to introduce the reader to commonly used estimation techniques. The authors defer to other industry resources for comprehensive details regarding how to perform such analyses.

1155 **2.3.2.1 Improving Estimation Based on Knowledge of Prior Events**

1156 In many cases, information about previous risk events may be helpful when estimating the  
1157 likelihood and impact of those in the future. For example, practitioners should consult industry  
1158 literature, their current power companies, or ISPs for descriptions of loss events within a given  
1159 sector or over a particular time frame. To determine the likelihood of a utility outage, the utility  
1160 provider can be asked to provide details regarding previous disruptions and their duration.

1161 As an example, consider the example organization in the first row in Table 2: Examples of Risk  
1162 Appetite and Risk Tolerance. It describes a global retail firm at which a senior leader has  
1163 expressed the risk tolerance statement that “any outage that exceeds four hours for any customer  
1164 requires significant corrective action.” Risk practitioners can review the actual availability of that  
1165 website for the previous year (using a table similar to Table 9.)

1166 **Table 9: Example Risk Tolerance Results Assessment**

Month	Total Hours in the Month	# of Hours Unavailable	Outage Customer %	Available Hrs (Total hrs- Outage)	Appetite Limit (99.95% of Total)	Tolerance Limit (Total - 4 hrs)	Avail % (Avail. hrs+ Total hrs)
Jan	744	1	2.4	743	743.628	739	99.87%
Feb	672			672	671.664	668	100.00%
Mar	744			744	743.628	740	100.00%
Apr	720	1.5	4.5	718.5	719.64	714.5	99.79%
May	744			744	743.628	740	100.00%
Jun	720			720	719.64	716	100.00%
Jul	744			744	743.628	740	100.00%
Aug	744			744	743.628	740	100.00%
Sep	720	2	0.5	718	719.64	714	99.72%
Oct	744			744	743.628	740	100.00%
Nov	720	3	1.5	717	719.64	713	99.58%
Dec	744			744	743.628	740	100.00%
<b>Yearly</b>	<b>8760</b>			<b>8752.5</b>	<b>8755.62</b>	<b>8704.5</b>	<b>99.91%</b>

1167 In this case, the system did not exceed the risk tolerance since no single outage exceeded four  
1168 hours, nor did any outage impact more than 5% of customers. While past performance is not a  
1169 guarantee of future probability, it provides some information that helps inform likelihood  
1170 estimates. The impact of an outage is likely similar to that in previous iterations; understanding  
1171 of the probability of an outage, given what is known about prior disruption, helps consider the  
1172 likely exposure in the future.

1173 When considering each risk in the risk register, practitioners will analyze the likelihood that any  
1174 risk would result in an impact that would exceed the risk tolerance. That consideration provides a

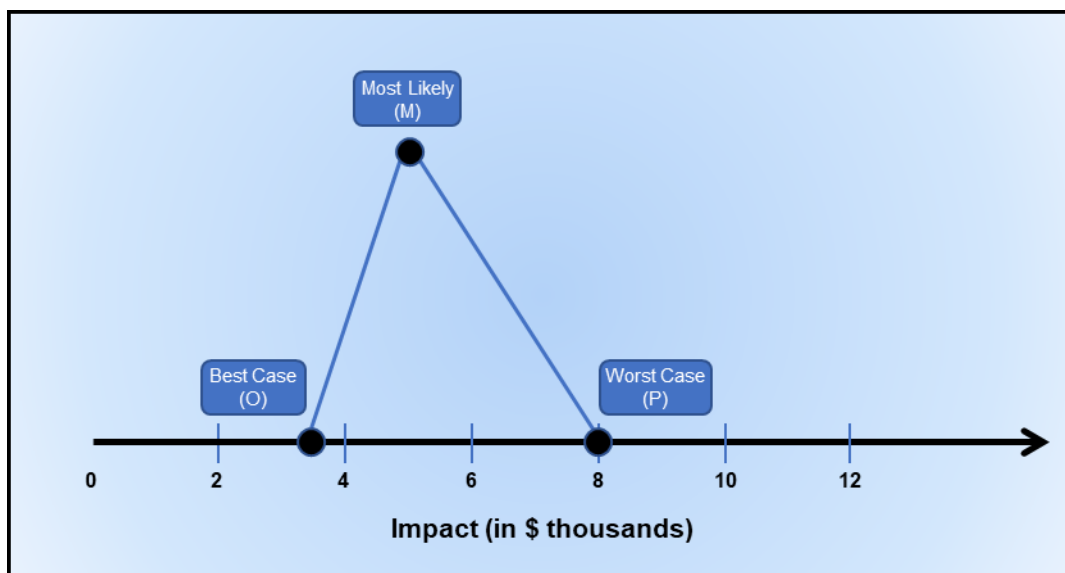
1175 basis for risk treatment decisions, either to ensure sufficient security controls or to review risk  
1176 tolerance statements to ensure that they represent reasonable and practical expectations.

### 1177 2.3.2.2 Three-Point Estimation

1178 One method for considering the likelihood or impact of a risk event is three-point estimation.  
1179 This method,<sup>24</sup> illustrated in Figure 12, is useful because it considers the judgement of available  
1180 subject matter experts (SMEs). For example, to determine the impact<sup>25</sup> of a successful phishing  
1181 attack, the risk estimator could poll an SME regarding:

- 1182 • The most optimistic (or Best Case) estimate (O),
- 1183 • A most likely estimate (M), and
- 1184 • A pessimistic (or worst case) estimate (P)).

1185 Figure 12 illustrates the result of an SME estimating a \$80K revenue loss due to an attack that  
1186 would be successful if employees are not properly trained. This first estimate represents a worst-  
1187 case scenario (pessimistic). The same estimator may suggest that, if the attack were successful  
1188 but limited in spread, only a \$35K impact is likely (optimistic). Finally, the SME may suggest  
1189 that the most likely impact of recovering from such as successful phishing attack would be \$50K.



1190  
1191 **Figure 12: Example Three-Point Estimate Graph (Triangle Distribution)**

1192 The three datapoints can be categorized as **Optimistic** (\$35K), **Pessimistic** (\$80K), and **Most**  
1193 **likely** (\$50K). A simple average of the three numbers (called a *Triangular Distribution*) is:

<sup>24</sup> For better estimates of O, M, and P and to eliminate bias, the estimator should poll multiple SMEs and determine the average of individual O values, M Values, and P values before proceeding with the three-point estimate.

<sup>25</sup> Although impact was used in this example, three-point estimating can also be used in determining likelihood.

1194  $EV = \frac{P+M+O}{3} = \$52.5K$  in this example where  $O=\$35K$ ,  $P=\$80K$ , and  $M=\$50K$

1195 In this phishing attack scenario, perhaps the estimator believes that the pessimistic and optimistic  
1196 values are too different and the estimator believes that the “most likely” estimate is a better  
1197 predictor. The estimator can give greater weight (perhaps 4 times as much) to the “most likely”  
1198 value using the following standard formula (called the *Average for a Beta Distribution*):

1199  $EV = \frac{P+4M+O}{6} = \$52.5K$  in this example where  $O=\$35K$ ,  $P=\$80K$ , and  $M=\$50K$

1200 The next question is, “How confident is the estimator regarding this estimated impact of a  
1201 successful phishing attack?” In three-point estimating, confidence (referred to as *sigma*, or  $\sigma$ ) in  
1202 the estimated value can be predicted by calculating the standard deviations from the mean. A  
1203 useful model for determining sigma is  $\sigma = \frac{P-O}{6}$ .

1204 Figure 13 illustrates these values graphically. Statistical models have demonstrated that, given  
1205 the mean (EV) and standard deviation, one can determine the level of confidence (or confidence  
1206 interval [CI]<sup>26</sup>) in the financial estimates. For the example above, the estimator will have a  
1207 68.27% confidence that the financial impact of a successful phishing attack will result in a loss  
1208 between \$39K and \$66K. The estimator will have approximately a 95% confidence that the loss  
1209 will be between \$25.5K and \$79.5K, and a nearly 100% confidence in the \$12K to \$93K  
1210 estimate. This application of CI is useful for each of the analysis methods in this section and  
1211 helps to represent the level of uncertainty in each of the estimates.

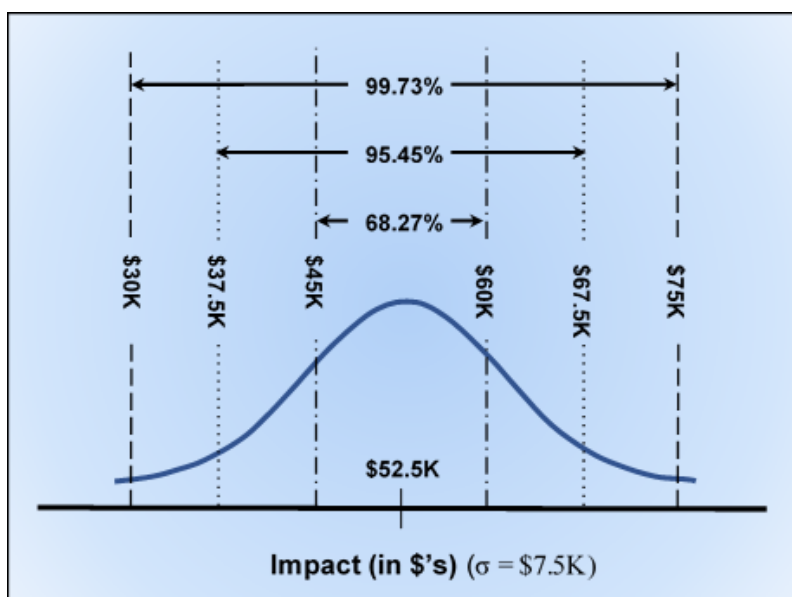


Figure 13: Example Three-Point Estimate Graph (Normal Distribution)

1212

1213

<sup>26</sup> The NIST Engineering Statistics Handbook points out that a confidence interval generates a lower and upper limit for the mean instead of a single estimate. The interval gives an indication of how much uncertainty there is in the estimate of the true mean. The narrower the interval, the more precise the estimate. (See <https://itl.nist.gov/div898/handbook/>)

1214 Confidence requirements and standardized methods of calculation should be included in senior  
1215 leaders' ERM strategy as part of enterprise risk management policy. This directive helps all risk  
1216 practitioners in the enterprise to consider risk in a similar manner and may help to improve the  
1217 reliability of likelihood and impact estimates. Additionally, as more information becomes  
1218 available regarding previous risk results and those of external organizations, this information can  
1219 be included in the estimation models and used to reduce uncertainty.

1220 Notably, the level of effort for estimating risk factors increases with the required level of rigor.  
1221 An estimate with very low CI might be simple to develop (perhaps as simple as flipping a coin)  
1222 but likely offers little value. A CI of 99% may be important in some situations, but the work to  
1223 develop a more precise estimate can cost significantly more than that required for a 90% CI.  
1224 Because the appropriate levels of accuracy and precision for cybersecurity risk analysis will vary  
1225 based on enterprise needs, the techniques and expectations should be clearly defined as part of  
1226 the enterprise's risk management guidance.

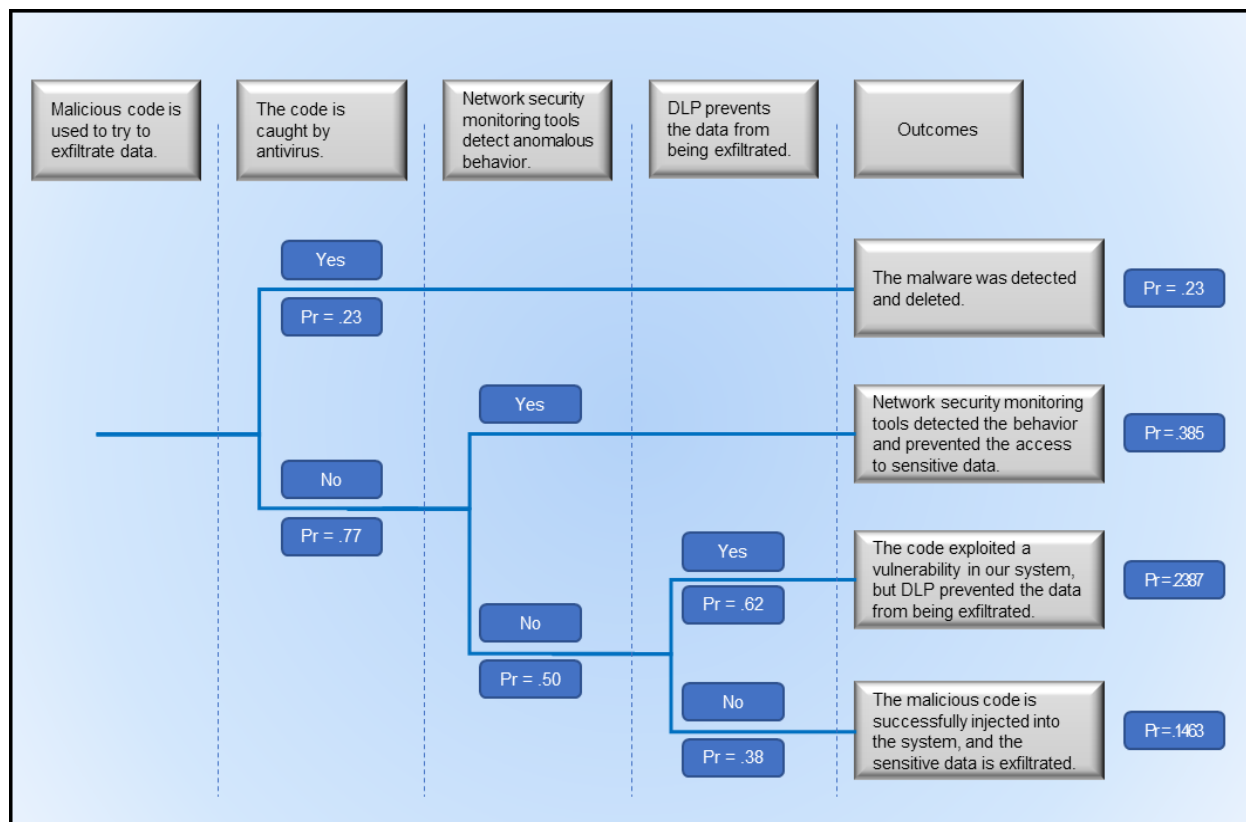
1227 It is critical that the risk practitioner consider the accuracy of the SME estimates overtime to  
1228 determine who or what source is more accurate and then consider that expert judgement more  
1229 prominently in calculations for the ongoing risk management cycles. Experts who are overly  
1230 optimistic or pessimistic create a broad range. However, when accuracy is required, especially  
1231 when calculating likelihood, knowing who the best estimators are in the organization is vitally  
1232 important.

### 1233 **2.3.2.3 Event Tree Analysis**

1234 Event Tree Analysis (ETA) is a graphical technique that helps practitioners evaluate the  
1235 downstream impact of a given scenario (as determined in Section 2.2.4.) The exercise helps  
1236 document a sequence of outcomes that could arise following an initiating threat event (e.g., a  
1237 particular TTP, as described in Section 2.2.2). By iterating through a series of what-if scenarios,  
1238 the practitioner can analyze each set of circumstances and determine the likelihood that the  
1239 results would occur. The below example demonstrates the layered defense that an organization  
1240 employs to prevent malicious code from being used to exfiltrate data. For each condition, the  
1241 analyst considers a Boolean (i.e., true or false) answer. The analyst then follows through each  
1242 iterative outcome until an end result is reached.

1243 This analysis can be performed in a qualitative way (using the yes or no conditions), or a  
1244 probability could be calculated for each scenario.

1245 In Figure 11, the probability is calculated based on whether the attack was prevented (Yes) or if  
1246 the attack was successful (No). Since each branch of the tree represents a binary option, the sum  
1247 of the two probabilities is always equal to 100% (or 1.00 in decimal format). In this example, the  
1248 calculated probabilities provide information about the potential success (or failure) of risk  
1249 response. The resulting probability (*Pr* values in the example below) is multiplied by the  
1250 anticipated financial loss of the scenario. In the tree below, if the anticipated loss of sensitive  
1251 data being exfiltrated is \$1.4M, then there is a \$205,100 risk exposure (\$1.4M x .1463).



1252  
1253

Figure 14: Example Event Tree Analysis

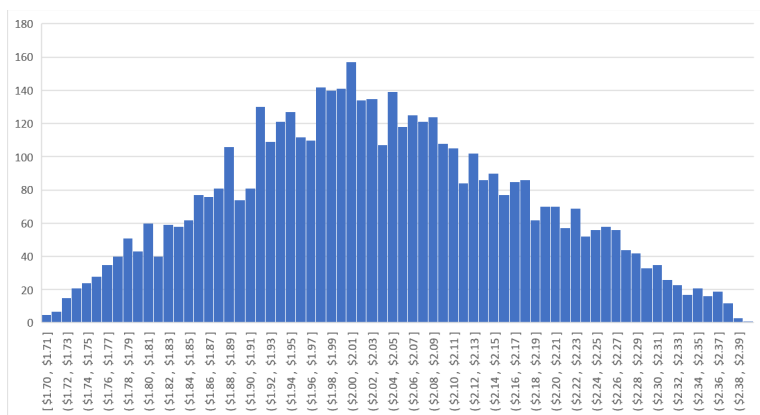
1254 In the above example, the event tree analysis of the cascading events illustrates the various  
1255 countermeasures available and the calculated percentage of the success of each defense. A  
1256 qualitative approach would still describe the Yes/No conditions and outcomes but would not  
1257 include specific probabilities of each branch. While such an analysis might be less helpful than a  
1258 quantitative approach, it would still provide meaningful information about potential harmful  
1259 impacts to the organization and the sequence of events leading to those consequences.

#### 1260 2.3.2.4 Monte Carlo Simulation

1261 While expert judgement is valuable in estimating risk parameters, one way to reduce subjectivity  
1262 in the above methods is to supplement that judgement using simulation models. For example,  
1263 using the Monte Carlo method, the above parameters could be modeled repeatedly (perhaps  
1264 several hundred thousand cycles) to help account for the many random variables inherent in  
1265 cybersecurity risks. Simulation is not always necessary, but with the variables for considering  
1266 likelihood and impact values (based on the factors described in Section 2.2), randomly sampled  
1267 probabilities can help identify a range of possible values.<sup>27</sup> The results of such a simulation can  
1268 be plotted on a graph or distribution to facilitate a visual understanding.

<sup>27</sup> An example implementation of a Monte Carlo analysis is available from NIST's Engineering Lab at:  
<https://www.nist.gov/services-resources/software/monte-carlo-tool>

1269 For example, when calculating the financial impact of the attack on the payroll system (from the  
 1270 example above), practitioners can use a simulation model to consider the most likely range  
 1271 between the low value (\$1.7M) and the high value (\$2.4M). The result of this simulation could  
 1272 be recorded as a histogram recording the frequency in which certain random values occurred, in  
 1273 this case resulting in a simulated estimated impact of \$2M.



1274 **Figure 15: Illustration of a Histogram from a Monte Carlo Estimation Simulation**

1275 **2.3.2.5 Bayesian Analysis**

1276 While there is value in using expert judgement to help estimate risk parameters, it might be  
 1277 improved based on information known from prior events, and the results may represent a more  
 1278 objective determination. For example, if the organization has identified that several critical  
 1279 software vulnerabilities have remained uncorrected, there is an increased likelihood that a threat  
 1280 actor will be able to exploit a software vulnerability to successfully gain access to the enterprise  
 1281 and exfiltrate valuable data. Bayesian analysis describes methods for considering conditional  
 1282 probability, applying a distribution model and a set of known prior data to help estimate the  
 1283 probability of a future (posterior) outcome.  
 1284

1285 While an SME might render an opinion regarding how likely a breach might be, that opinion can  
 1286 be improved by what the enterprise risk managers already know about the success of previous  
 1287 attempts by others or about the success of adversaries in similar enterprises. Prior knowledge,  
 1288 drawn from internal observations and events at similar organizations can be of significant value  
 1289 for improving the accuracy and reliability of estimates, such as those for determining the  
 1290 likelihood of an impactful event or for estimating the impact of that uncertainty on the enterprise  
 1291 objectives. Similar methods can be used to estimate whether several conditions might occur  
 1292 (joint probability) or that certain conditions would occur given other external variables (marginal  
 1293 probability).



1294 **2.4 Determination and Documentation of Risk Exposure**

1295 Once the probability that an impactful event will occur has been determined and the most  
 1296 probable impact of such an occurrence has been calculated, the information is recorded in the  
 1297 risk register. Figure 16 shows how an organization can record this information.

ID	Priority	Risk Description	Risk Category	Current Assessment		
				Likelihood	Impact	Exposure Rating
1	TBD	An outsider using an APT breaches the organization's network, remains undetected for months, and exfiltrates much of the organization's critical and proprietary intellectual property by employing a Privilege Escalation attack.	Access Control (AC)	.6	\$2,000,000	\$1,200,000

1298  
 1299 **Figure 16: Example Quantitative Analysis Results**

1300 Figure 17 provides an illustration of similar information in a qualitative manner.

ID	Priority	Risk Description	Risk Category	Current Assessment		
				Likelihood	Impact	Exposure Rating
5	TBD	Criminals are able to infiltrate our customers' mobile banking application due to endpoint user validation or an encryption issue, fraudulently causing customer funds to be transferred to an unauthorized location.	System & Information Integrity (SI) / System & Comms Protection (SC)	H	H	H

1301  
 1302 **Figure 17: Example Qualitative Analysis Results**

1303 In this example, internal SMEs feel that the likelihood of an attack on the organization's mobile  
 1304 banking application is High. A survey of the SMEs reflects their decision that the impact to the  
 1305 organization if customers experience such an event would be High, based on customers'  
 1306 perception that the application lacked sufficient security protections. In this case, the practitioner  
 1307 would use the enterprise assessment scale for determining qualitative risk, such as the application  
 1308 of Table I-2, *Assessment Scale – Level of Risk (Combination of Likelihood and Impact)*, from SP  
 1309 800-30, Revision 1. Based on that table, an event with High likelihood and High impact would  
 1310 be ranked as a High exposure. As an example, this decision would help inform the selection of  
 1311 strong user authentication and encryption controls.

1312 Risk priority is described in NISTIR 8286B and will be determined based on mission objectives,  
 1313 enterprise strategy, and the results of comprehensive risk identification and analysis activities.

1314 **3 Conclusion**

1315 The use of the methods and templates described in this report supports effective communication  
 1316 and coordination of ERM and CSRM activities. As described in NISTIR 8286, understanding the  
 1317 expectations of senior leaders and business managers regarding risk is a key input for managing  
 1318 cybersecurity risk at the Business and System levels. This is reflected by including the  
 1319 determination of enterprise risk appetite and organizational risk tolerance among the first tasks in  
 1320 both the Cybersecurity Framework and the NIST Risk Management Framework.

Notional Cybersecurity Risk Register											
ID	Priority	Risk Description	Risk Category	Current Assessment			Risk Response Type	Risk Response Cost	Risk Response Description	Risk Owner	Status
				Likelihood	Impact	Exposure Rating					
1											
2											
3											
4											
5											
Continually Communicate, Learn, and Update											

1321 **Figure 18: Use of a Cybersecurity Risk Register Improves Risk Communications**

1322  
 1323 Once these expectations have been defined and communicated, practitioners can use various  
 1324 methods to ensure that risk is managed to stay within the limits articulated. They do this by  
 1325 identifying potential risks (as described in Section 2.2), estimating the probability that an  
 1326 impactful event will occur, calculating the potential harm to the enterprise after such an event,  
 1327 and analyzing the actual risk exposure (the product of likelihood and impact).

1328 Industry practitioners have demonstrated that applying risk analysis techniques like those  
 1329 described in Section 2.3 can be helpful for identifying, responding to, and monitoring enterprise  
 1330 cybersecurity risk. While statistical analysis has been available for hundreds of years, many  
 1331 within the CSRM community are only recently recognizing the value of applying a more  
 1332 quantitative approach to risk estimation. It seems likely that those in the CSRM domain will  
 1333 continue to develop and improve statistical methods to estimate risk and include guidance  
 1334 regarding the application of various statistical distribution models.

1335 Responses to previous requests for information have indicated that enterprise risk managers  
 1336 desire increased rigor in the manner in which risk identification, analysis, and reporting are  
 1337 performed. This publication is designed to provide guidance and to further conversations  
 1338 regarding ways to improve CSRM and the coordination of CSRM with ERM. Subsequent  
 1339 publications in this series will describe improvements to the manner in which risk scenarios are  
 1340 prioritized, treated, and reported. Through the 8286 series publications, NIST will continue to  
 1341 collaborate with public- and private-sector communities to address methods for improving  
 1342 integration and coordination of ERM and CSRM.

**References**

- [1] Stine K, Quinn S, Witte G, Gardner RK (2020) Integrating Cybersecurity and Enterprise Risk Management (ERM). (National Institute of Standards and Technology, Gaithersburg, MD), NIST Interagency or Internal Report (IR) 8286. <https://doi.org/10.6028/NIST.IR.8286>
- [2] National Institute of Standards and Technology (2020) *Online Informative References*. Available at <https://www.nist.gov/cyberframework/informative-references>
- [3] International Organization for Standardization (ISO) (2018) Risk management—Guidelines. ISO 31000:2018. Available at <https://www.iso.org/standard/65694.html>
- [4] Joint Task Force (2018) Risk Management Framework for Information Systems and Organizations: A System Life Cycle Approach for Security and Privacy. (National Institute of Standards and Technology, Gaithersburg, MD), NIST Special Publication (SP) 800-37, Rev. 2. <https://doi.org/10.6028/NIST.SP.800-37r2>
- [5] National Institute of Standards and Technology (2018) Framework for Improving Critical Infrastructure Cybersecurity, Version 1.1. (National Institute of Standards and Technology, Gaithersburg, MD). <https://doi.org/10.6028/NIST.CSWP.04162018>
- [6] Office of Management and Budget (2016) OMB Circular No. A-123, Management’s Responsibility for Enterprise Risk Management and Internal Control. (The White House, Washington, DC), OMB Memorandum M-16-17, July 15, 2016. Available at <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2016/m-16-17.pdf>
- [7] Joint Task Force Transformation Initiative (2012) Guide for Conducting Risk Assessments. (National Institute of Standards and Technology, Gaithersburg, MD), NIST Special Publication (SP) 800-30, Rev. 1. <https://doi.org/10.6028/NIST.SP.800-30r1>
- [8] Office of Management and Budget (2019) OMB Memorandum M-19-03, Strengthening the Cybersecurity of Federal Agencies by enhancing the High Value Asset Program. (The White House, Washington, DC), OMB Memorandum M-19-03, December 10, 2018. Available at <https://www.whitehouse.gov/wp-content/uploads/2018/12/M-19-03.pdf>
- [9] National Institute of Standards and Technology (2020) *Security Content Automation Protocol*. Available at <https://csrc.nist.gov/projects/security-content-automation-protocol>
- [10] Software Engineering Institute (2007) Introducing OCTAVE Allegro: Improving the Information Security Risk Assessment Process. (Software Engineering Institute,

- Pittsburgh, PA), Technical Report CMU/SEI-2007-TR-012. Available at [https://resources.sei.cmu.edu/asset\\_files/TechnicalReport/2007\\_005\\_001\\_14885.pdf](https://resources.sei.cmu.edu/asset_files/TechnicalReport/2007_005_001_14885.pdf)
- [11] Joint Task Force Transformation Initiative (2020) Security and Privacy Controls for Information Systems and Organizations. (National Institute of Standards and Technology, Gaithersburg, MD), NIST Special Publication (SP) 800-53, Rev. 5. <https://doi.org/10.6028/NIST.SP.800-53r5>
- [12] Joint Task Force Transformation Initiative (2014) Assessing Security and Privacy Controls in Federal Information Systems and Organizations: Building Effective Assessment Plans. (National Institute of Standards and Technology, Gaithersburg, MD), NIST Special Publication (SP) 800-53A, Rev. 4, Includes updates as of December 18, 2014. <https://doi.org/10.6028/NIST.SP.800-53Ar4>
- [13] International Electrotechnical Commission (IEC) (2019) Risk management – Risk assessment techniques. IEC 31010:2019. Available at <https://www.iso.org/standard/72140.html>

**1345 Appendix A—Acronyms**

1346 Selected acronyms and abbreviations used in this paper are defined below.

1347	AIS	Automated Indicator Sharing
1348	APT	Advanced Persistent Threat
1349	BIA	Business Impact Analysis
1350	CCE	Common Configuration Enumeration
1351	CDM	Continuous Diagnostics and Mitigation
1352	CI	Confidence Interval
1353	CISA	Cybersecurity and Infrastructure Security Agency
1354	CMDB	Configuration Management Database
1355	CPE	Common Platform Enumeration
1356	CSRM	Cybersecurity risk management
1357	CTI	Cyber Threat Intelligence
1358	CVE	Common Vulnerabilities and Exposures
1359	CVSS	Common Vulnerability Scoring System
1360	DHS	Department of Homeland Security
1361	DIB	Defense Industrial Base
1362	DISCE	U.S. Department of Defense Information Sharing Environment
1363	ERM	Enterprise Risk Management
1364	ETA	Event Tree Analysis
1365	FOIA	Freedom of Information Act
1366	HVA	High-Value Asset
1367	IDS	Intrusion Detection Systems
1368	IEC	International Electrotechnical Commission

1369	IoC	Indicators of Compromise
1370	ISAC	Information Sharing Analysis Center
1371	ISAO	Information Sharing and Analysis Organization
1372	ITAM	Information Technology Asset Management
1373	ITL	Information Technology Laboratory
1374	NCCIC	National Cybersecurity and Communications Integration Center
1375	NISTIR	NIST Interagency or Internal Report
1376	NTCTF	NSA/CSS Technical Cyber Threat Framework
1377	NVD	National Vulnerability Database
1378	OLIR	Online Informative References
1379	OMB	Office of Management and Budget
1380	OVAL	Open Vulnerability Assessment Language
1381	RMF	Risk Management Framework
1382	SCAP	Security Content Automation Protocol
1383	SIEM	Security Incident Event Monitoring
1384	SME	Subject Matter Experts
1385	SWOT	Strength, Weakness, Opportunity, Threat
1386	TTP	Tactics, Techniques, and Procedures
1387	VPN	Virtual Private Network

1388 **Appendix B—NVD/NCP Support for Vulnerability Identification and Analysis**

1389 The Computer Security Division of NIST’s Information Technology Laboratory, in collaboration  
1390 with the DHS Cybersecurity & Infrastructure Security Agency (CISA), provide the National  
1391 Vulnerability Database (NVD) and the National Checklist Program (NCP) as two key resources  
1392 for identifying, evaluating, and responding to cybersecurity risks. These sites are available at  
1393 <https://nvd.nist.gov> and <https://checklists.nist.gov>, respectively.

1394 These resources, originally created in 2000 as the Internet – Categorization of Attacks Toolkit  
1395 (ICAT), are available without cost to all public- and private-sector organizations to help improve  
1396 CSRM. The data that these sites provide enable the automation of vulnerability management,  
1397 security measurement, and compliance. The sites include databases of security checklist  
1398 references, security-related software flaws, misconfigurations, product names, and impact  
1399 metrics. These sites act as the U.S. Government repository of standards-based vulnerability  
1400 management data represented using the Security Content Automation Protocol (SCAP),  
1401 including the following data exchange specifications: [9]

- 1402 • The Common Vulnerabilities and Exposures (CVE) specification helps products and  
1403 personnel track known vulnerabilities and their characteristics. Each vulnerability is  
1404 assigned a unique identifier that enables common reference and information sharing.
- 1405 • The Common Vulnerability Scoring System (CVSS) provides a severity score and other  
1406 severity factors for each CVE. This severity data helps enterprise automation tools  
1407 support risk analysis and prioritization.
- 1408 • The Common Configuration Enumeration (CCE) provides unique identifiers to system  
1409 configuration issues in order to facilitate the fast and accurate correlation of configuration  
1410 data across multiple information sources and tools. A recent NVD offering provides a  
1411 correlation between a CCE (that might represent a vulnerability through  
1412 misconfiguration) and one or more security controls as described in NIST SP 800-53,  
1413 *Security and Privacy Controls for Information Systems and Organizations*. This feature  
1414 supports the improved automation of documentation and the mitigation of vulnerabilities  
1415 (available at <https://nvd.nist.gov/config/cce>).
- 1416 • The Common Platform Enumeration (CPE) uniquely identifies asset types to help  
1417 automate the association of vulnerabilities with enterprise asset types.
- 1418 • Checking languages, such as Open Vulnerability Assessment Language (OVAL), enables  
1419 automated assessments to identify and report resources that may be vulnerable.

1420 While the specifications above support data exchange regarding vulnerabilities on various  
1421 platforms, the methods for identification on endpoints themselves can vary greatly from product  
1422 to product. Many product vendors have developed highly sophisticated methods for detecting  
1423 and reporting those flaws. Because practitioners need to ensure that those detection and reporting  
1424 processes are reliable and interoperable, NIST provides the SCAP Validation Program. Products  
1425 on the SCAP Validated Products List have demonstrated that they are able to perform against a  
1426 set of derived test requirements to ensure that they can fulfill the CSRM purpose.