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Framework / Cybersecurity / NIST Special Publications

NIST SP 800-171A Rev. 3, Assessing Security Requirements for Controlled Unclassified Information

NIST SP 800-171A Rev. 3 (May 14, 2024) gives the assessment procedures for the 97 SP 800-171 Rev. 3 requirements: ODP determinations first, findings satisfied or other than satisfied.



What it is

NIST SP 800-171A Revision 3 is the current NIST publication of assessment procedures for the 97 security requirements in SP 800-171 Revision 3. Nonfederal organizations that process, store or transmit Controlled Unclassified Information (CUI) use it, as do the assessors who review them. The National Institute of Standards and Technology (NIST) published it on May 14, 2024, the same day it withdrew the June 2018 edition that it supersedes, and released an HTML version on June 25, 2024. Its authors are Ron Ross and Victoria Pillitteri, and the procedures are also issued in the Cybersecurity and Privacy Reference Tool (CPRT) and OSCAL formats.

At a glance

PUBLISHER National Institute of Standards and Technology (NIST)	TYPE Assessment / Maturity Model	VERSION Revision 3 (May 14, 2024)
EFFECTIVE May 14, 2024	DOMAIN Cybersecurity	FAMILY NIST Special Publications
REGION United States	INDUSTRY Government & Public Sector	ADOPTION MODEL Regulatory Compliance
IMPLEMENTATION COMPLEXITY High		

Source: csrc.nist.gov/pubs/sp/800/171/a/r3/final

Why it matters

- **Parameters assessed first** Where a requirement has an ODP, the first determination statements confirm the value is defined, such as A.03.01.01.ODP[01] through ODP[06] for account management, before the implementation is tested (Section 2.1).
- **A line back to SP 800-53A** Procedures are derived from SP 800-53A and each one links to its source procedure, so assessors who know the federal control assessment method can reuse it (Section 2.1 and Appendix E).
- **Seventeen families, including three new ones** Table 1 lists the families; Planning, System and Services Acquisition and Supply Chain Risk Management join the fourteen that Revision 2 assessed.
- **Two possible findings** Every determination statement ends as satisfied or other than satisfied, with other than satisfied also covering the case where the assessor could not get enough information (C.3).

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How SmartSuite supports NIST 800-171A Rev.3

ODP Value Register

Record the organization-defined parameter for each requirement from Appendix D Table 6, with approver and date, so the first determination of every procedure is answered from a stored value.

Determination Statements as Records

Hold statements such as A.03.01.01.a[01] through A.03.01.01.g.03 under their requirement in Compliance Management and mark each one satisfied or other than satisfied with a dated finding.

Assessment Plan Workflow

Use Internal Audit Management to capture the C.2 plan: requirements in scope, procedures selected and tailored, methods and objects chosen, approvals obtained, then track C.3 execution to completion.

Evidence Objects

Attach the specifications, mechanism outputs, activity records and interview notes to the statements they support, so the Section 2.2 assurance case is assembled from the records rather than rebuilt for each report.

Other-Than-Satisfied Findings

Route each unmet determination to Cyber & IT Risk with a remediation owner, due date and link back to the requirement, and report open items by family.

System Security Plan Link

Keep the system security plan that scopes the assessment (Section 1.1) as a record tied to the systems, requirements and findings it covers, with its revision history.

Common framework mappings

CIS Controls v8.1 | FedRAMP Rev. 5 | HIPAA (NIST SP 800-66 Rev. 2) | ISO 27001:2022 | NIST CSF 2.0 | NIST 800-53 Rev.5 | PCI DSS 4.0.1 | SOC 2

Official resources

NIST SP 800-171A Rev. 3

Provides assessment procedures for NIST SP 800-171, detailing security requirements for protecting CUI.

csrc.nist.gov/pubs/sp/800/171/a/r3/final

NIST SP 800-171

Defines the security requirements for protecting Controlled Unclassified Information (CUI) in non-federal systems.

csrc.nist.gov/publications/detail/sp/800-171/rev-2/final

NIST SP 800 Series Overview

Outlines the series of publications addressing computer security from NIST including SP 800-171.

csrc.nist.gov/publications/sp800

CUI Program Overview

Describes policies and procedures for CUI protection across federal and non-federal entities.

archives.gov/cui/about

Frequently asked questions

What changed between the June 2018 edition and NIST SP 800-171A Rev. 3?

Appendix E lists three changes: the procedures were updated to match SP 800-171 Rev. 3, organization-defined parameters were added to the determination statements, and a references section was added to each procedure with a link to its source in SP 800-53A. The requirement set also moved from fourteen families and 110 requirements to the 17 families and 97 requirements of Revision 3 (Table 1).

What is an ODP determination statement?

Where a requirement contains an organization-defined parameter, the assessment objective begins with a statement that the parameter is defined, such as A.03.01.01.ODP[01], the time period for account inactivity before disabling is defined (Section 2.1). Later statements then use the defined value, for example A.03.01.01.f.02, system accounts are disabled when they have been inactive for the defined time period. Appendix D Table 6 lists every ODP by family.

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What do satisfied and other than satisfied mean?

Each determination statement an assessor executes produces one of two findings (C.3). Satisfied means the assessment objective addressed by the statement has been met with an acceptable result. Other than satisfied means it has not been met, or that the assessor could not obtain enough information to make the determination, which still counts as an unmet objective until resolved.

Does CMMC use NIST SP 800-171A Rev. 3?

Not yet. 32 CFR 170.14(d) says assessment of the CMMC security requirements is prescribed by NIST SP 800-171A Jun2018, and 32 CFR 170.16, 170.17 and 170.18 apply that edition to Level 2 self-assessments, Level 2 certification assessments by a C3PAO and Level 3 assessments by DCMA DIBCAC. DFARS 252.204-7020 likewise records the SP 800-171 version assessed when scores are posted to SPRS, so the edition a contract calls for should be confirmed first.

What are the four phases of an assessment in Appendix C?

Preparing for assessments (C.1), developing assessment plans (C.2), conducting assessments (C.3), and analyzing, documenting and reporting results (C.4), a process that Appendix C says is based on the methodology in SP 800-53A. Tables 2 to 5 summarize the purpose and expected outcomes of each phase, for example that the plan phase ends with procedures selected, tailored, optimized and approved.

License included / downloadable: Yes NIST SP 800-171A Rev. 3 is free of charge from NIST as a PDF and an HTML version, with the procedures also available in the CPRT and OSCAL formats.

Full framework page and mappings: smartsuite.com/frameworks/nist-sp-800-171a-rev-3

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