



STATEWIDE POLICY



State of Arizona

STATEWIDE POLICY (8220): SYSTEM SECURITY MAINTENANCE

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1. AUTHORITY

To effectuate the mission and purposes of the Arizona Department of Homeland Security, the Agency shall establish a coordinated plan and program for information technology (IT) protections implemented and maintained through policies, standards and procedures (PSPs) as authorized by Arizona Revised Statutes (A.R.S.) § 41-4254 and § 41-4282.

2. PURPOSE

The purpose of this policy is to establish the baseline controls for management and maintenance of agency system controls.

3. SCOPE

3.1 Application to Budget Units - This policy shall apply to all BUs as defined in A.R.S. § 18-101(1).

3.2 Application to Systems - This policy shall apply to all agency systems:

- a. **(P)** Policy statements preceded by “(P)” are required for agency systems categorized as protected.
- b. **(P-PCI)** Policy statements preceded by “(P-PCI)” are required for agency systems with payment card industry data (e.g., cardholder data).
- c. **(P-PHI)** Policy statements preceded by “(P-PHI)” are required for agency systems with protected healthcare information.
- d. **(P-FTI)** Policy statements preceded by “(P-FTI)” are required for agency systems with federal taxpayer information.

3.3 Information owned or under the control of the United States Government shall comply with the Federal classification authority and Federal protection requirements.

4. EXCEPTIONS

4.1 PSPs may be expanded or exceptions may be taken by following the Statewide Policy Exception Procedure.

4.1.1 Existing IT Products and Services

- a. BU subject matter experts (SMEs) should inquire with the vendor and the state or agency procurement office to ascertain if the contract provides for additional products or services to attain compliance with PSPs prior to submitting a request for an exception in accordance with the Statewide Policy Exception Procedure.

4.1.2 IT Products and Services Procurement

- a. Prior to selecting and procuring information technology products and services BU subject matter experts shall consider statewide information security PSPs when specifying, scoping, and evaluating solutions to meet current and planned requirements.

4.2 BU has taken the following exceptions to the Statewide Policy Framework:

Section Number	Exception	Explanation / Basis

5. ROLES AND RESPONSIBILITIES

5.1 The Arizona Department of Homeland Security Director shall:

- a. Be ultimately responsible for the correct and thorough completion of statewide information security PSPs throughout all state BUs.

5.2 State Chief Information Security Officer (CISO) shall:

- a. Advise the Director on the completeness and adequacy of the BU activities and documentation provided to ensure compliance with statewide information security PSPs throughout all state BUs;
- b. Review and approve BU security and privacy PSPs and requested exceptions from the statewide security and privacy PSPs; and
- c. Identify and convey to the State CIO the risk to state systems and data based on current implementation of security controls and mitigation options to improve security.

5.3 Enterprise Security Program Advisory Council (ESPAC)

- a. Advise the State CISO on matters related to statewide information security policies and standards.

5.4 BU Director shall:

- a. Be responsible for the correct and thorough completion of Agency Information Security PSPs within the BU;
- b. Ensure BU compliance with System Security Maintenance Policy; and
- c. Promote efforts within the BU to establish and maintain effective use of agency systems and assets.

5.5 BU Chief Information Officer (CIO) shall:

- a. Work with the BU Director to ensure the correct and thorough completion of Agency Information Security PSPs within the BU; and
- b. Ensure System Security Maintenance Policy is periodically reviewed and updated to reflect changes in requirements.

5.6 BU Information Security Officer (ISO) shall:

- a. Advise the BU CIO on the completeness and adequacy of the BU activities and documentation provided to ensure compliance with agency information security PSPs;
- b. Ensure the development and implementation of an adequate controls enforcing the System Security Maintenance Policy for the BU agency systems; and
- c. Ensure all personnel understand their responsibilities with respect to secure system management and maintenance.

6. STATEWIDE POLICY

6.1 System Configuration Management

6.1.1 Configuration Management Plan - The BU shall develop, document, and implement a configuration management plan for agency systems that will:

- a. Address the roles, responsibilities, and configuration management processes and procedures;
- b. Establish a process for identifying configuration items throughout the system development lifecycle and for managing the configuration of the configuration items;
- c. Define the configuration items for the agency system and place the configuration items under configuration management;

- d. Ensure configuration items are reviewed and approved by BU-identified roles; and
- e. Protect the configuration management plan from unauthorized disclosure and modification. [National Institute of Standards and Technology (NIST) 800 53 CM-9]

6.1.2 Baseline Configuration - The BU shall develop, document, and maintain a current baseline configuration of each agency system. [NIST 800 53 CM-2]

- a. **Baseline Configuration Reviews and Updates** - The BU shall review and update the baseline configurations for systems, at least annually, upon significant changes to system functions or architecture, and as an integral part of system installations and upgrades. [NIST 800-53 CM-2] [Internal Revenue Service (IRS) Pub 1075]
 - 1. (P) **Automated Support for Accuracy and Currency** - The BU shall maintain currency, completeness, accuracy, and availability of the baseline configuration of the system using automated mechanisms, tools, or services. [NIST 800-53 CM-2(2)]
- b. (P) **Baseline Configuration Retention** - The BU shall retain at least one previous version of baseline configurations to support rollback. [NIST 800 53 CM-2 (3)] [IRS Pub 1075] However, all State BUs must comply with Arizona State Library, Archives and Public Records rules and implement whichever retention period is most rigorous, binding or exacting. Refer to: [http://apps.azlibrary.gov/records/general_rs/Information%20Technology%20\(IT\).pdf](http://apps.azlibrary.gov/records/general_rs/Information%20Technology%20(IT).pdf) Item 8.
- c. (P) **Baseline Configuration for External High Risk Areas** - The BU shall establish separate baseline configurations for computing resources (e.g., notebook computers) issued to individuals traveling to locations deemed to be a significant risk. The organization shall apply BU-identified protective controls (e.g., examination for physical tampering, purge and reimage disk drives) to these devices when the individuals return from travel. [NIST 800-53 CM-2 (7)] [IRS Pub 1075]

6.1.3 (P) Configuration Change Control - The BU shall: [NIST 800 53 CM-3] [IRS Pub 1075]

- a. Determine the types of changes to the agency system that are configuration-controlled;
- b. Review proposed configuration-controlled changes to the agency system and approves or disapproves such changes with explicit consideration for security impact analysis;
- c. Document configuration change decisions associated with the agency system;
- d. Implement approved configuration-controlled changes to the system;

- e. Retain activities associated with configuration-controlled changes to the agency system in compliance with Arizona State Library, Archives and Public Records rules and implement whichever retention period is most rigorous, binding or exacting. Refer to:
[http://apps.azlibrary.gov/records/general_rs/Information%20Technology%20\(IT\).pdf](http://apps.azlibrary.gov/records/general_rs/Information%20Technology%20(IT).pdf) Item 8;
- f. Monitor and review activities associated with configuration-controlled changes to the system; and
- g. Coordinate and provide oversight for configuration control activities through an established configuration control board that convenes at least monthly to review the activities associated with configuration-controlled changes to agency systems.

6.1.4 Change Approval - The BU shall review and approve/disapprove proposed configuration-controlled changes to the agency systems. Security and privacy impact analysis shall be included as an element of the decision. [NIST 800 53 CM-4]

- a. **(P) Test, Validate, and Document Changes** - Approved changes shall only be implemented on an operational system after the change control board ensures that the change has been tested, validated, and documented. [NIST 800 53 CM-3 (2)] [IRS Pub 1075]
- b. **(P) Verification of Controls** - After system changes, verify that the impacted controls are implemented correctly, operating as intended, and producing the desired outcome with regards to meeting the security and privacy requirements for the system. [NIST 800-53 CM-4(2)]
- c. **(P) Security and Privacy Representatives** - Require that the change control board have representatives of security and privacy. [NIST 800-53 CM-3(4)]

6.1.5 (P) Change Restriction Enforcement - The BU shall ensure that adequate physical and/or logical controls are in place to enforce restrictions associated with changes to agency systems. The BU shall permit only qualified and authorized individuals to access agency systems for the purpose of initiating changes, including upgrades and modifications. [NIST 800 53 CM-5] [IRS Pub 1075]

6.1.6 Configuration Settings - The BU shall: [NIST 800 53 CM-6]

- a. Establish and document configuration settings for components employed within the agency system using Statewide, BU-wide, or agency information specific security configuration checklists that reflect the most restrictive mode consistent with operational requirements;
- b. Implement the configuration settings;

- c. Identify documents, and approve any deviations from established configuration settings for all system components for which security checklists have been developed and approved; and
- d. Monitor and control changes to the configuration settings in accordance with organizational policies and procedures.

6.1.7 Agency System Component Inventory - The BU shall develop and document an inventory of agency system components (including authorized wireless access points and business justification for those access points) that accurately reflects the system, is consistent with the defined boundaries of the agency system, is at the level of granularity deemed necessary for tracking and reporting hardware and software, and includes hardware inventory specifications (e.g., manufacturer, device type, model, serial number, and physical location), software license information, software version numbers, component owners, and for networked components: machine names and network addresses. The inventory shall not duplicate an accounting of components assigned to any other system. [NIST 800 53 CM-8] [PCI DSS 2.4 , 11.1.1]

- a. **Inventory Reviews and Updates** - The BU shall review and update the system component inventory annually and as an integral part of component installations, removals, and system updates. [NIST 800 52 CM-8 (1)]
- b. **(P) Inventory Automated Detection** - The BU shall detect the presence of unauthorized hardware, software, and firmware components within the system using automated mechanisms quarterly, and take actions to disable network access, isolate the component, or notify the appropriate BU personnel of the unauthorized component when unauthorized components are detected. [NIST 800 53 CM-8 (3)] [IRS Pub 1075]
- c. **(P-PCI) Inventory Payment Card Data Capture Devices** - The BU shall maintain an up-to-date list of devices. The list shall include device make and model, device location, and device serial number (or other method of unique identification). [PCI DSS 9.9, 9.9.1]

6.1.8 (P) Confidential Information Location - The BU shall identify and document the location of confidential data and specific components on which the information is processed and stored; identify and document the users who have access to the system and system components where the information is processed and stored; and document changes to the location where the information is processed and stored. [NIST 800-53 CM-12]

- a. **(P) Automated Tools to Support Confidential Information Location** - The BU shall use automated tools to identify confidential information on systems and system components to ensure controls are in place to protect BU confidential information and individual privacy. [NIST 800-53 CM-12(1)]

6.1.9 Software Usage Restrictions - The BU shall use software and associated documentation in accordance with contract agreements and copyright laws; track the use of software and associated documentation protected by quantity licenses to control copying and distribution; and control and document the use of peer-to-peer file sharing technology to ensure that this capability is not used for the unauthorized distribution, display, performance, or reproduction of copyrighted work. [NIST 800 53 CM-10]

6.2 Agency system Maintenance - In addition to the change management requirements of Section 6.1, the following requirements apply to the maintenance of agency systems:

6.2.1 Controlled Maintenance - The BU shall: [NIST 800 53 MA-2]

- a. Schedule, document, and review records of maintenance, repair, and replacement on agency system components in accordance with manufacturer or vendor specifications and BU requirements;
- b. Approve and monitor all maintenance activities, whether performed on site or remotely and whether the system or system components are serviced onsite or removed to another location;
- c. Explicitly approve the removal of the agency system or system components from the BU facilities for off site maintenance, repair, or replacement;
- d. Sanitize equipment to remove confidential information from associated media prior to removal from BU facilities for off site maintenance, repair, or replacement;
- e. Ensure equipment removed from the BU facilities is properly sanitized prior to removal. (Refer to Media Protection Policy P8250 for appropriate sanitization requirements and methods); and
- f. Check all potentially impacted security controls to verify that the controls are still functioning properly following maintenance, repair, or replacement actions. These checks are documented in BU maintenance records and shall include date and time of maintenance, a description of the maintenance performed, names of individuals or groups performing the maintenance, the name of the escort (if applicable), and system components or equipment removed or replaced.

6.2.2 (P) Maintenance Tools - The BU shall approve, control, and monitor the use of system maintenance tools and shall review previously approved system maintenance tools annually. [NIST 800 53 MA-3] [IRS Pub 1075]

- a. (P) Tool Inspection - Maintenance tools, and/or diagnostic and test programs used by maintenance personnel shall be inspected for improper

or unauthorized modifications including malicious code prior to the media being used in the agency system. [NIST 800 53 MA-3(1)(2)] [IRS Pub 1075]

- b. (P) Prevent Unauthorized Removal - The BU shall prevent the removal of maintenance equipment containing confidential information by verifying that there is no confidential information contained on the equipment; sanitizing or destroying the equipment; retaining the equipment within the BU facility; or obtaining an exemption from the BU ISO explicitly authorizing removal of the equipment from the BU facility. [NIST 800-53 MA-3(3)]

6.2.3 Remote Maintenance - The BU shall: [NIST 800 53 MA-4]

- a. Approve and monitor remote maintenance and diagnostic activities;
- b. Allow the use of remote maintenance and ensure diagnostic tools are consistent with BU policy and documented in the security plan for the agency system;
- c. Employ two-factor authentication for the establishment of remote maintenance and diagnostic sessions;
- d. Maintain records for all remote maintenance and diagnostic activities in compliance with Arizona State Library, Archives and Public Records rules and implement whichever retention period is most rigorous, binding or exacting. Refer to:
[http://apps.azlibrary.gov/records/general_rs/Information%20Technology%20\(IT\).pdf](http://apps.azlibrary.gov/records/general_rs/Information%20Technology%20(IT).pdf) Item 3; and
- e. Terminate network sessions and connections upon the completion of remote maintenance and diagnostic activities.

6.2.4 Maintenance Personnel - The BU shall: [NIST 800 53 MA-5]

- a. Establish a process for maintenance personnel authorization and maintain a list of authorized maintenance organizations or personnel;
- b. Ensure non-escorted personnel performing maintenance on agency systems have required access authorizations; and
- c. Designate organizational personnel with required access authorizations and technical competence to supervise the maintenance activities of personnel who do not possess the required access authorizations.

6.2.5 (P) Timely Maintenance - The BU shall obtain maintenance support and/or spare parts for critical systems and system components within BU-defined time periods of failure. [NIST 800-53 MA-6]

6.3 System and Information Integrity [HIPAA 164.132(c),(1)]

6.3.1 Flaw Remediation - The BU shall: [NIST 800 53 SI-2]

- a. Identify, report, and correct system flaws;
- b. Test software and firmware updates related to flaw remediation are tested for effectiveness and potential side effects prior to installation;
- c. Install security-relevant software and firmware updates and patches within 30 days of release from the vendor; and [PCI DSS 6.2]
- d. Incorporate flaw remediation into the organizational configuration management process.

6.3.2 (P) Automated Flaw Remediation System - The BU shall employ an automated mechanism monthly to determine if system components have applicable security-relevant software and firmware updates installed. [NIST 800 53 SI-2(2)] [IRS Pub 1075]

6.3.3 Malicious Code Protection - The BU shall: [NIST 800 53 SI-3] [HIPAA 164.308(a)(5)(ii)(B) - Addressable] [PCI DSS 5.2.3.1]

- a. Implements a centrally managed malicious code protection mechanisms at agency system entry and exit points and all systems commonly affected by malicious software particularly personal computers and servers to detect and eradicate malicious code; [NIST 800 53 SI-3, PL-9] [PCI DSS 5.1, 5.1.1]
- b. For systems considered to be not commonly affected by malicious software, perform periodic evaluations to identify and evaluate evolving malware threats in order to confirm whether such systems continue to not require anti-virus software. [PCI DSS 5.1.2]
- c. Update malicious code protection mechanisms automatically whenever new releases are available in accordance with the BU's configuration management policy and procedures; [NIST 800 53 SI-3)]
- d. Configure malicious code protection mechanisms to:
 - 1. Perform weekly scan of the agency system and real-time scans of files from external sources at the endpoint, and network entry and exit points as the files are downloaded, opened, or executed; [PCI DSS 5.2]
 - 2. Block and quarantine malicious code and/or send an alert to a system administrator in response to malicious code detection;
 - 3. Generate audit logs. [PCI DSS 5.2]; and
 - 4. (P-PCI) all known types of malware [PCI DSS 5.2.2]
- e. Address the receipt of false positives during malicious code detection and eradication and resulting potential impact on the availability of the agency system; and
- f. Ensure that anti-virus mechanisms are actively running and cannot be disabled or altered by users unless specifically authorized by

management on a case-by-case basis for a limited time period. [PCI DSS 5.3]

6.3.4 System Monitoring - The BU shall: [NIST 800 53 SI-4a] [HIPAA 164.308(a)(1)(iii)(D)] [PCI DSS 5.4.1]

- a. Monitor the agency systems to detect attacks and indicators of potential attacks and unauthorized local, network, and remote connections;
- b. Identify unauthorized use of the agency system through BU-defined intrusion-monitoring tools;
- c. Invoke internal monitoring capabilities or deploy monitoring devices strategically within the agency system, including at the perimeter and critical points inside the environment to collect essential security-relevant information and to track specific types of transactions of interest to the BU; [PCI DSS 11.4]
- d. Analyze detected events and anomalies;
- e. Adjust the level of system monitoring activity when there is a change in risk to organizational operations and assets, individuals, other organizations, or the agency based on confidential information;
- f. Receive alerts from:
 - 1. malicious code protection mechanisms;
 - 2. intrusion detection or prevention systems;
 - 3. boundary protection mechanisms such as firewalls, gateways, and routers;
- g. Obtain legal opinion with regard to system monitoring activities in accordance with applicable federal and State laws, executive orders, directives, policies, or regulations; and
- h. Provide State-defined system monitoring data to the State-defined roles on a state-defined basis.
- i. (P) Employ automated mechanisms to alert security personnel of inappropriate or unusual activities with security and privacy implications. [NIST 800-53 SI-4(12)]
- j. (P) Implement host-based monitoring mechanism on systems that receive, process, store, or transmit confidential information. [NIST 800-53 SI-4(23)]
- k. Updates - All intrusion detection systems and/or prevention engines, baselines, and signatures shall be kept up-to-date. [PCI DSS 11.4]

- l. (P) Automated Tools - The BU shall employ automated tools and mechanisms to support near real-time analysis of events. [NIST 800-53 SI-4(2)] [IRS Pub 1075]
- m. (P) Inbound and Outbound CommunicationsTraffic - The BU shall determine criteria for unusual or unauthorized activities or conditions for inbound and outbound communications traffic, monitor inbound and outbound communications traffic for unusual or unauthorized activities or conditions. [NIST 800 53 SI-4(4)] [IRS Pub 1075]
- n. (P) System Generated Alerts - The BU shall ensure the system alerts system administrators when the BU-defined indicators of compromise or potential compromise occur. [NIST 800 53 SI-4(5)] [IRS Pub 1075] [PCI DSS 11.4]

6.3.5 Security Alerts, Advisories, and Directives - The BU shall implement a security alert, advisory and directive program to: [NIST 800 53 SI-5]

- a. Receive information security alerts, advisories, and directives from the agency and additional services as determined necessary by the BU ISO on an on-going basis;
- b. Generate internal security alerts, advisories, and directives as deemed necessary;
- c. Disseminate security alerts, advisories, and directives to appropriate employees and contractors, other organizations, business partners, supply chain partners, external service providers, and other supporting organizations as deemed necessary; and
- d. Implement security directives in accordance with established time frames, or notify the issuing organization of the degree of noncompliance.

6.3.6 (P) Integrity Verification Tools - The BU shall employ integrity verification tools to detect unauthorized changes to critical software, system files, configuration files, or content files. Upon detection of such changes the BU shall perform BU-defined actions. [NIST 800 53 SI-7] [IRS Pub 1075] [HIPAA 164.312(c)(1)] [PCI DSS 11.5] [PCI DSS 11.6.1]

- a. (P) **Integrity Checks** - The BU shall ensure agency systems will perform integrity checks at least weekly and at start up, the identification of a new threat to which agency systems are susceptible, and the installation of new hardware, software, or firmware. [NIST 800-53 SI-7(1)] [IRS Pub 1075] [PCI DSS 11.5] [PCI DSS 11.6.1]
- b. (P) **Automated Notifications of Integrity Violations** - The BU shall employ automated tools that provide notification to BU-defined personnel or roles upon discovering discrepancies during integrity verification. [NIST 800-53 SI-7(2)]

- c. (P) **Incident Response Integration** - The BU shall incorporate the detection of unauthorized changes to critical system files into the BU incident response capability. [NIST 800-53 SI-7(7)] [IRS Pub 1075]

6.3.7 Spam Protection - The BU shall employ spam protection mechanisms at agency system entry and exit points to detect and take action on unsolicited messages and updates spam protection mechanisms automatically updated when new releases are available. [NIST 800-53 SI-8, 8(2)] [IRS Pub 1075]

- a. **Central Management** - Spam protection mechanisms are centrally managed. [NIST 800-53 PL-9] [IRS Pub 1075]
- b. **Automated Updates** - Spam protection mechanisms automatically update daily. [NIST 800-53 SI-8(2)]
- c. **Continuous Learning Capability** - Spam protection mechanisms incorporate a learning capability to more effectively identify legitimate communications traffic. [NIST 800-53 SI-8(3)].

6.3.8 (P) Information Input Validation - The BU shall ensure agency systems check the validity of system inputs from untrusted sources, such as user input. [NIST 800-53 SI-10] [IRS Pub 1075]

6.3.9 Error Handling - The BU shall ensure the agency system generates error messages that provide information necessary for corrective actions without revealing information that could be exploited by adversaries and reveals error messages only to system administrator roles. [NIST 800-53 SI-11] [IRS Pub 1075]

6.3.10 Information Management and Retention - The BU shall handle and retain information within the agency system and information output from the system in accordance with applicable federal and State laws, Executive Orders, directives, policies, regulations, standards, and operational requirements. [NIST 800-53 SI-12] [ARS 44-7041] [Arizona State Library Retention Schedules for Information Technology (IT) Records]

- a. (P) The BU shall limit personally identifiable information being processed in the information life cycle to BU-defined elements of personally identifiable information. [NIST 800-53 S-12(1)]
- b. (P) The BU shall use BU-defined techniques to minimize the use of personally identifiable information for research, testing, or training. [NIST 800-53 SI-12(2)]
- c. The BU shall use the techniques consistent with those defined in the Media Protection Policy (P8250) and to dispose of, destroy, or erase information following the retention period in accordance with applicable federal and state laws, Executive Orders, directives, policies, regulations,

standards, and operational requirements. [NIST 800-53 SI-12(3)] Arizona State Library Retention Schedules for Information Technology (IT) Records]

6.3.11 (P) Memory Protection - The BU shall ensure the system implements controls to protect the system memory from unauthorized code execution. [NIST 800-53 SI-16].

6.3.12 Establish Operational Procedures – The BU shall ensure that security policies and operational procedures for protecting systems against malware are documented, in use, and known to all affected parties. [PCI DSS 5.4]

7. DEFINITIONS AND ABBREVIATIONS

7.1 Refer to the PSP Glossary of Terms located on the [ADOA-ASET](#) and [NIST Computer Security Resource Center](#) websites.

8. REFERENCES

- 8.1** STATEWIDE POLICY FRAMEWORK 8220 System Security Maintenance
- 8.2** Statewide Policy Exception Procedure
- 8.3** STATEWIDE POLICY FRAMEWORK P8250 Media Protection
- 8.4** National Institute of Standards and Technology, Special Publication 800-53 Revision 5, Security and Privacy Controls for systems and Organizations, September 2020.
- 8.5** ARS § 44-7041
- 8.6** Arizona State Library Retention Schedules for Information Technology (IT) Records
- 8.7** HIPAA Administrative Simplification Regulation, Security and Privacy, CFR 45 Part 164, February 2006
- 8.8** Payment Card Industry Data Security Standard (PCI DSS) v3.2.1, PCI Security Standards Council, May 2018.
- 8.9** IRS Publication 1075, Tax Information Security Guidelines for Federal, State, and Local Agencies: Safeguards for Protecting Federal Tax Returns and Return Information, 2021.
- 8.10** General Records Retention Schedule for All Public Bodies, Information Technology (IT) Records, Schedule Number: 000-12-41, Arizona State Library, Archives and Public Records, Item Numbers 3 and 8

9. ATTACHMENTS

None.

10. REVISION HISTORY

Date	Change	Revision	Signature
9/01/2014	Initial release	Draft	Aaron Sandeen, State CIO and Deputy Director
10/11/2016	Updated all the Security Statutes	1.0	Morgan Reed, State CIO and Deputy Director
9/17/2018	Updated for PCI-DSS 3.2.1	2.0	Morgan Reed, State of Arizona CIO and Deputy Director
5/26/21	Annual Updates	3.0	Tim Roemer, Director of Arizona Department of Homeland Security & State Chief Information Security Officer
5/19/2023	Annual Updates	4.0	Ryan Murray, Deputy Director Department of Homeland Security & State Chief Information Security Officer
1/30/2025 2/11/2025	Annual Updates	5.0	Errika Celsy, Chief Privacy and Compliance Officer; Deputy Director Department of Homeland Security & State Chief Information Security Officer