

Align TFE Instructions

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**MIDWEST
RELIABILITY
ORGANIZATION**

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INTRODUCTION

The purpose of this document is to outline steps that registered entities should follow to perform the following actions on their Technical Feasibility Exceptions (TFEs) within Align:

- Submit new TFEs
- Submit Material Change Reports (MCRs) for existing TFEs
- Update existing TFEs with non-material changes
- Provide supporting documentation through the ERO Secure Evidence Locker (SEL)
- Terminate TFEs that are no longer needed

For any questions related to TFEs, please contact tfe@mro.net.

TARGET AUDIENCE

Registered entities that have Cyber Assets in their CIP program where Technical Feasibility Exceptions (TFEs) are applicable.

ACCESSING ALIGN & SEL

All users must have an [ERO Portal Account](#) to access Align and the SEL. Prior to go-live, NERC ensured Primary Compliance Contacts (PCCs) at registered entities with ERO Portal Accounts were set up as an “Align Registered Entity Submitter”, “SEL Submitter”, and “Entity Administrator”.

Once an ERO Portal Account has been created, access to Align will be requested through the portal. The PCC, or designated Entity Administrator is responsible for approving access requests.

For additional detailed information on setting up and administering access to Align and the SEL, please see the [Registered Entities: User Access Guide](#) located on the [NERC Learning website](#). The NERC Learning website also contains helpful training materials and videos related to the TFE process.

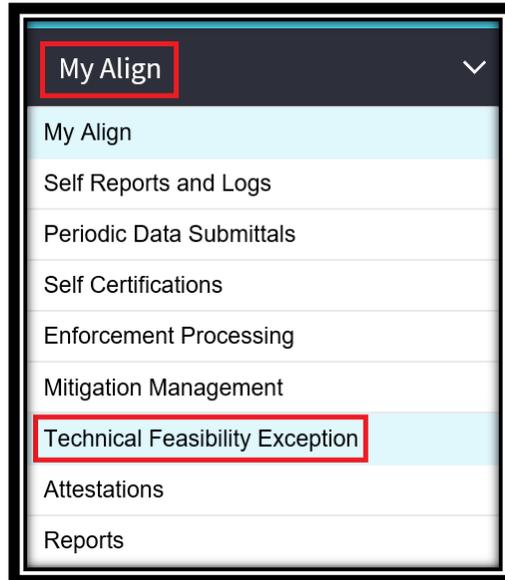


ACCESSING TFE PORTLET WITHIN ALIGN

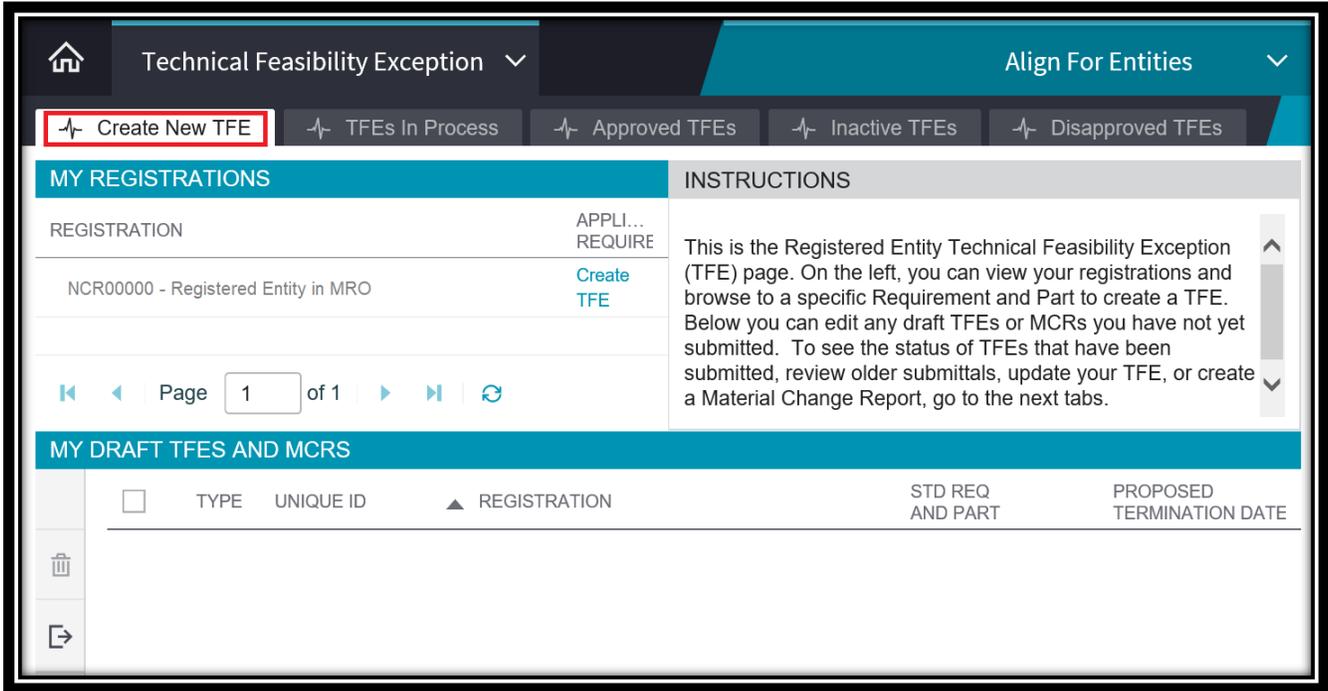
From the Align Login Page, enter Align username and password.



Navigate to the TFE portlet through the My Align drop-down menu in the top left.



This will open the Create New TFE tab from which new TFEs can be created, as well as view draft TFEs or MCRs under the My Draft TFEs and MCRs view.



In addition to the Create New TFE tab, there are four other tabs of interest across the top:

- TFEs in Process
 - TFEs or MCRs that have been submitted to MRO for review.
- Approved TFEs
 - List of approved TFEs, and where MCRs, non-material changes, or Terminations will be initiated.
- Inactive TFEs
 - List of TFEs that were approved, but have reached their termination dates, or were manually terminated.
- Disapproved TFEs
 - List of disapproved TFEs.



CREATING NEW TFE

From the Create New TFE tab, select Create TFE next to the Registration detail section.

The screenshot shows the 'Technical Feasibility Exception' application interface. At the top, there is a navigation bar with a home icon, the title 'Technical Feasibility Exception', and a dropdown menu 'Align For Entities'. Below this is a tabbed interface with five tabs: 'Create New TFE', 'TFEs In Process', 'Approved TFEs', 'Inactive TFEs', and 'Disapproved TFEs'. The 'Create New TFE' tab is active. The main content area is split into two sections: 'MY REGISTRATIONS' and 'INSTRUCTIONS'. The 'MY REGISTRATIONS' section contains a table with one row: 'NCR00000 - Registered Entity in MRO'. To the right of this row is an 'APPLI... REQUIRE' column with a 'Create TFE' button highlighted in a red box. Below the table is a pagination control showing 'Page 1 of 1'. The 'INSTRUCTIONS' section contains a text block explaining the TFE process. Below this is another section titled 'MY DRAFT TFES AND MCRS' which contains an empty table with columns for 'TYPE', 'UNIQUE ID', 'REGISTRATION', 'STD REQ AND PART', and 'PROPOSED TERMINATION DATE'.

This will open a popup from which the Requirement Part for the TFE will be selected.

The screenshot shows a 'SELECT REQUIREMENT AND PART' popup window. It has a title bar 'SELECT REQUIREMENT AND PART' and a sub-header 'SELECT APPLICABLE REQUIREMENT AND PART'. Below this is a table with two columns: 'STD REQ AND PART' and 'CREATE TFE'. The table contains five rows of data:

STD REQ AND PART	CREATE TFE
CIP-005-6 R1.4	+
CIP-005-6 R2.1	+
CIP-005-6 R2.2	+
CIP-005-6 R2.3	+
CIP-005-6 R2.4	+



If you click and highlight a Standard and Requirement from the list, a pop-out window will appear showing the Requirement language, as well as some additional detail that may be useful to reference.

SELECT REQUIREMENT AND PART

SELECT APPLICABLE REQUIREMENT AND PART		REQUIREMENT
STD REQ AND PART	CREATE TFE	
CIP-005-6 R2.2	+	Standard and Requirement CIP-005-6 R2.
CIP-005-6 R2.3	+	Requirement Language Each Responsible Entity shall implement one or more documented processes that collectively include the applicable requirement parts, where technically feasible, in CIP-005-6 Table R2 –Remote Access Management.
CIP-005-6 R2.4	+	Time Horizon(s) Operations Planning Same-Day Operations Violation Risk Medium Factor (VRF)
CIP-005-6 R2.5	+	Requirement Number R2.
CIP-006-6 R1.3	+	Measure M2. Evidence must include the documented processes that collectively address each of the applicable requirement parts in CIP-005-6 Table R2 –Remote Access Management and additional evidence to demonstrate implementation as described in the Measures column of the table.
CIP-007-6 R1.1	+	Requirement Applicability BA TOP TO
CIP-007-6 R4.3	+	
CIP-007-6 R5.1	+	

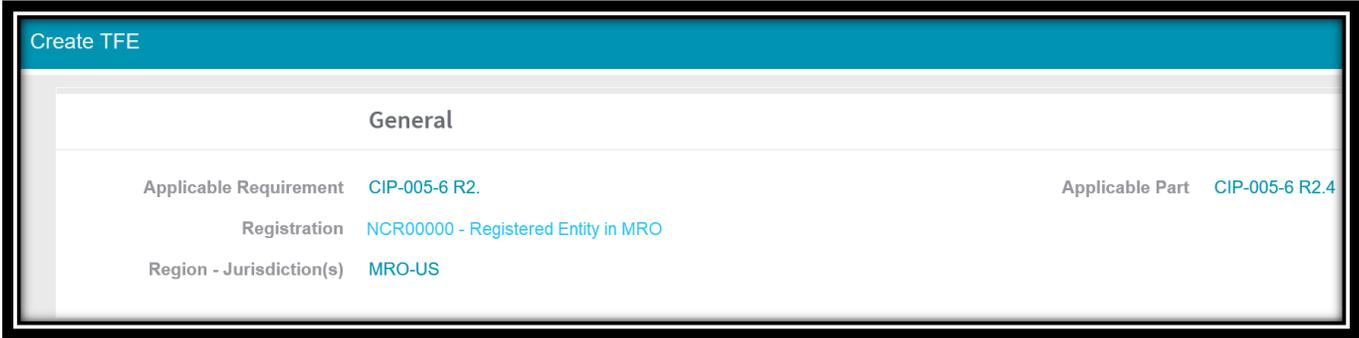
To continue forward creating a TFE for the selected Requirement, click the plus icon:

SELECT REQUIREMENT AND PART

SELECT APPLICABLE REQUIREMENT AND PART		REQUIREMENT
STD REQ AND PART	CREATE TFE	
CIP-005-6 R2.2	+	Standard and Requirement CIP-005-6 R2.
CIP-005-6 R2.3	+	Requirement Language Each Responsible Entity shall implement one or more documented processes that collectively include the applicable requirement parts, where technically feasible, in CIP-005-6 Table R2 –Remote Access Management.
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CIP-007-6 R1.1	+	Requirement Applicability BA TOP TO
CIP-007-6 R4.3	+	
CIP-007-6 R5.1	+	



This will launch the Create TFE form, and in the General section, there will be information auto-populated. There is nothing to modify in this section, only verify that the information is accurate.



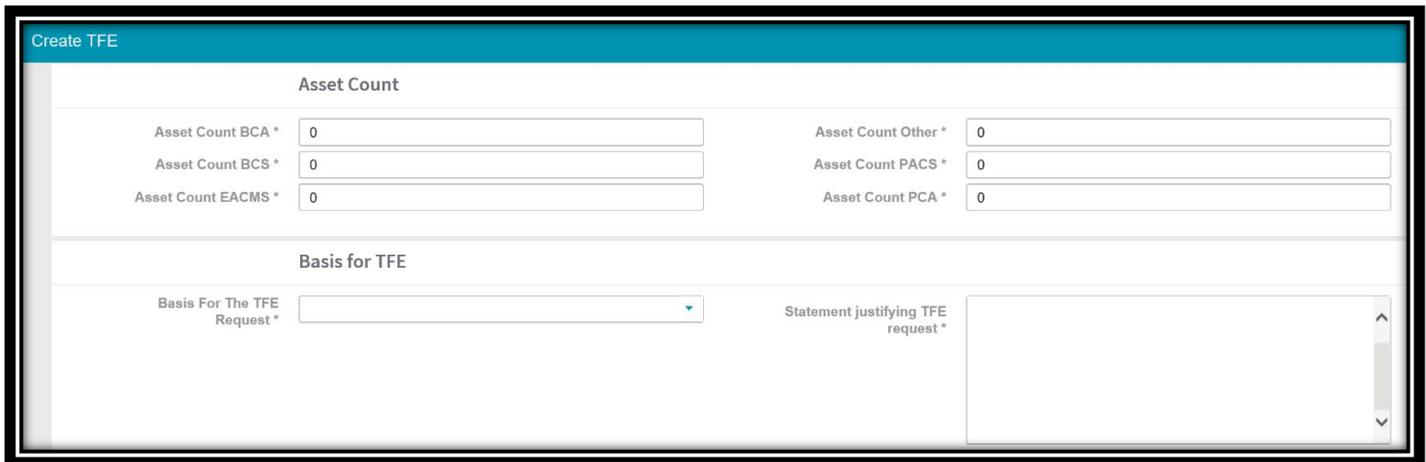
The screenshot shows the 'Create TFE' form with the 'General' section. The header is 'Create TFE'. Below it, the section is titled 'General'. The form contains the following fields:

Applicable Requirement	CIP-005-6 R2.	Applicable Part	CIP-005-6 R2.4
Registration	NCR00000 - Registered Entity in MRO		
Region - Jurisdiction(s)	MRO-US		

Continue scrolling down the Create TFE form, and the next sections will be Asset Count and Basis for TFE.

In the Asset Count section, document the type of assets being requested for the TFE, and how many of each device type. Eventually, additional detail about these assets will be provided, but because this is typically classified as sensitive information, this will be provided through the SEL.

In the Basis for TFE section, select an option from the dropdown to establish the basis for the TFE request, and then add a brief statement justifying the need for a TFE. Specific details about the basis can be provided through the SEL.



The screenshot shows the 'Create TFE' form with the 'Asset Count' and 'Basis for TFE' sections. The header is 'Create TFE'. Below it, the section is titled 'Asset Count'. The form contains the following fields:

Asset Count BCA *	0	Asset Count Other *	0
Asset Count BCS *	0	Asset Count PACS *	0
Asset Count EACMS *	0	Asset Count PCA *	0

Below the 'Asset Count' section is the 'Basis for TFE' section. It contains the following fields:

Basis For The TFE Request *	<input type="text"/>	Statement justifying TFE request *	<input type="text"/>
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The final section of the Create TFE form is for the Proposed Mitigation. Provide a brief summary of the mitigating and/or compensating measures for the issues underlying the TFE request, being careful to omit sensitive details. Specific details about the mitigating and/or compensating measures should be provided through the SEL.

The next dropdown asks if the mitigating and/or compensating measures have been fully implemented. If 'Yes', a prompt will appear to enter the actual completion date. If 'No', a prompt will appear to enter the proposed completion date.

The final dropdown asks if there is a planned time to terminate the TFE. If 'Yes', a prompt will appear to add the proposed termination date. If 'No', a prompt will appear to add a justification for why the TFE should be open-ended.

The screenshot shows a web form titled "Create TFE" with a sub-section "Proposed Mitigation". The form contains three main input areas: a large text box for a summary of measures, a dropdown menu for "Have the compensating and/or mitigating measures been fully implemented? *", and another dropdown menu for "Has a plan and a time schedule been proposed to terminate the TFE? *". At the bottom of the form are two buttons: a green "Update" button and a grey "Close" button. The form ID "FORM: R2_TFE_01_Create" is visible in the bottom left corner of the form area.

Now that the Create TFE form has been completed, click the Update button, and navigate back to the Create New TFE landing page.

- TIP: If nothing appears to have happened after clicking the Update button, scroll back to the top of the TFE form, and there should be an error message indicating which mandatory field is missing information. When all mandatory fields are filled in appropriately, the update should go through successfully.



The newly created TFE will be shown under My Draft TFEs and MCRs view. If the TFE doesn't immediately show up, click the refresh button along the bottom. At this point, the TFE has not been submitted to MRO, and is still in a draft state.

- TIP: While the TFE is listed on the My Draft TFEs and MCRs view, if it is determined to be no longer needed prior to submission, or was drafted with incorrect information, such as Standard and Requirement Part, it can be deleted by checking the box for the appropriate TFE and selecting the trash can icon on the left side of the screen.

Technical Feasibility Exception

Align For Entities

Create New TFE | TFEs In Process | Approved TFEs | Inactive TFEs | Disapproved TFEs

MY REGISTRATIONS

REGISTRATION	APPLI... REQUIRE
NCR00000 - Registered Entity in MRO	Create TFE

Page 1 of 1

MY DRAFT TFEs AND MCRs

	TYPE	UNIQUE ID	REGISTRATION	STD REQ AND PART	PROPOSED TERMINATION DATE
<input type="checkbox"/>	TFE	XXXX-MRO-TFE-000338-0	NCR00000 - Registered Entity in MRO	CIP-005-6 R2.4	

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The next step is to approve and finalize the TFE for submission to MRO. A user at your entity with permission to approve this TFE will need to open up the draft, and review and finalize the information. Click on the Unique ID link to open and edit the TFE. There have been three new sections added to complete: Assertions, Evidence, and Action.

In the Assertions section, the CIP Sr. Manager or Delegate will enter their name, the date that they authorized the TFE, and then check the box, which serves as a proxy for their signature.

TFE-000338

Assertions

CIP Sr. Manager or Delegate name *

Authorization date *

Signature of CIP Sr. Manager or delegate *

- By checking this box, I affirm that I am the CIP Sr. Manager or Delegate identified above, and I have read this TFE Request and approve the proposed compensating measures and/or mitigating measures and the implementation plan, and that on behalf of NCR00000 - Registered Entity in MRO, I believe approval of this TFE Request is warranted pursuant to the criteria specified in Section 3.1 of Appendix 4D of the NERC Rules of Procedure.

In the Evidence section, a URL and reference number is provided for uploading evidence and other documents to the SEL. See the [Secure Evidence Locker Asset Form](#) section within this document for instructions on obtaining, and filling out a template asset form which shall be used for providing additional details about the assets, and mitigating and/or compensating measures.

TFE-000338

Evidence

Secure Evidence Locker Instructions Submit Evidence or Attachments related to this item via ERO Secure Evidence Locker (SEL) located at <https://eusstg.eroenterprise.com/nerc-infrastructure> with the following reference number:
MRO|NCR00000|TFE-000338-0|TFE-000338-0|CIP-005-6|R2.

If you are hosting your own SEL, please provide a hyperlink to your locker in the comment section below.

SEL Comment



When the TFE is ready to be submitted to MRO, scroll down to the Action section. Like many other forms in Align, the Action field will dictate what Align does with the form once the Update button is clicked.

- Selecting CEA Review and then clicking Update will send the TFE to MRO for review.
- Selecting No Action and then clicking Update will save the form as a draft, and keep it in the My Draft TFEs and MCRs view.

The screenshot shows a form titled 'TFE-000338' with an 'Action' section. The 'Instructions' field contains the text: 'Instructions, as RE it is possible to submit this TFE Request for CEA review, selecting the corresponding Action option below and click "Update".' The 'Action' dropdown menu is set to 'CEA Review'. Below this is a 'Submission Comment*' text area. At the bottom of the form are two buttons: 'Update' (in green) and 'Close'.

Once the TFE has been submitted to MRO for review, it will move to the TFEs in Process tab within Align. During this time, MRO may submit a Request for Information (RFI) if additional details are needed as part of the TFE review. RFIs show up in the home dashboard as well as being indicated by an email that informs a RFI for a specific TFE has been posted by MRO.

The screenshot shows the 'Align For Entities' dashboard. The 'Technical Feasibility Exception' dropdown is open, and the 'TFEs In Process' tab is selected and highlighted with a red box. Below the navigation tabs is a table titled 'SUBMITTED TFES AND MCRS IN REGION PROCESSING'. The table has columns for 'T...', 'UNIQUE ID', 'NCR', 'REGISTRATION', 'SUBMIT... DATE', and 'REVIEW DUE DATE'. One row is visible with the following data: 'TFE', '2021-MRO-TFE-000338-0', 'NCR00000', 'Registered Entity', '06/24/2...', and '08/23/20...'. To the right of the table is an 'INSTRUCTIONS' section with the text: 'TFEs and MCRs in the upper pane are currently being processed by the Region or LRE. You can access any related RFIs for this TFE by opening the TFE and scrolling to the bottom of the page.' At the bottom of the table area, there is a pagination control showing 'Page 1 of 1'.

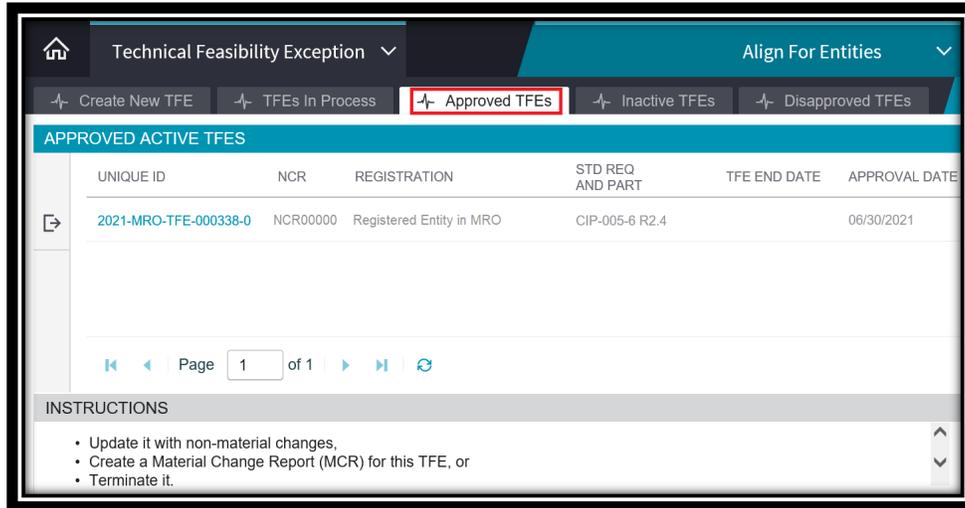
If MRO approves the TFE it will move to the Approved TFEs tab and likewise, if it is disapproved, it will move to the Disapproved TFEs tab.



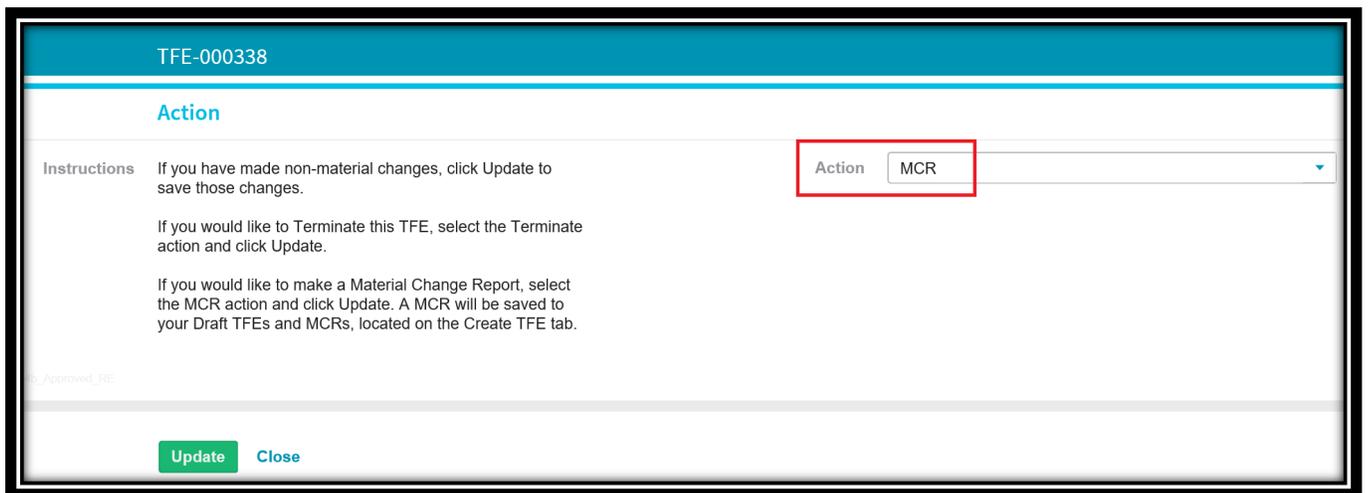
MATERIAL CHANGE REPORTS

When there is a Material Change in the facts underlying approval of a TFE, such as an increase in assets, or changes to the mitigating and/or compensating measures, a Material Change Report (MCR) should be submitted.

Navigate to the Approved TFEs tab, which will show the current list of approved TFEs, and from where a MCR will be initiated.



Click on the Unique ID for the TFE that requires changes, and this will open the TFE window. Scroll down to the Action section at the bottom of the TFE. From the Action dropdown, select MCR, and click the Update button.



A copy of the TFE will be created and shown on the Create New TFE tab under the My Draft TFEs and MCRs section.

The screenshot shows the 'Technical Feasibility Exception' application interface. At the top, there are navigation tabs: 'Create New TFE' (highlighted with a red box), 'TFEs In Process', 'Approved TFEs', 'Inactive TFEs', and 'Disapproved TFEs'. Below the tabs, there are two main sections: 'MY REGISTRATIONS' and 'INSTRUCTIONS'. The 'MY REGISTRATIONS' section shows a table with columns for 'REGISTRATION', 'APPLICABLE REQUIREMEN', and 'Create TFE'. Below this is a pagination control showing 'Page 1 of 1'. The 'MY DRAFT TFES AND MCRS' section is highlighted with a red box and contains a table with columns: 'TYPE', 'UNIQUE ID', 'REGISTRATION', 'STD REQ AND PART', and 'PROPOSED TERMINATION'. A row in this table is highlighted with a red box, showing 'MCR', '2021-MRO-TFE-000338-1', 'NCR00000 - Registered Entity in MRO', and 'CIP-005-6 R2.4'. The 'INSTRUCTIONS' panel on the right contains text explaining the TFE page and its functionality.

Click on the Unique ID link to open and edit the TFE. An updated detailed asset form will need to be provided via the SEL. See the [Secure Evidence Locker Asset Form](#) section within this document for instructions on obtaining, and filling out a template asset form which shall be used for providing additional details about the assets, and mitigating and/or compensating measures.

After making the necessary updates for the Material Change, scroll down to the Action section, and select CEA Review. Clicking the Update button will then send the MCR to MRO for review.

The screenshot shows the 'Action' section for TFE-000338. At the top, the title 'TFE-000338' is displayed. Below the title, the 'Action' section contains instructions: 'Instructions, as RE it is possible to submit this TFE Request for CEA review, selecting the corresponding Action option below and click "Update".' There is a dropdown menu for 'Action' with 'CEA Review' selected. Below the dropdown is a 'Submission Comment*' text area. At the bottom of the section, there are two buttons: 'Update' and 'Close'.



Once the MCR has been submitted to MRO for review, it will move to the TFEs in Process tab within Align. During this time, MRO may submit a RFI if additional details are needed as part of the TFE review. RFIs show up in the home dashboard as well as being indicated by an email that informs a RFI for a specific TFE has been posted by MRO.

The screenshot shows the 'Align For Entities' interface. At the top, there is a navigation bar with a home icon, 'Technical Feasibility Exception' dropdown, and 'Align For Entities' dropdown. Below this is a tabbed menu with options: 'Create New TFE', 'TFEs In Process' (selected), 'Approved TFEs', 'Inactive TFEs', and 'Disapproved TFEs'. The main content area is split into two panes. The left pane is titled 'SUBMITTED TFES AND MCRS IN REGION PROCESSING' and contains a table with the following data:

TYPE	UNIQUE ID	NCR	REGISTRATION	SUBMIT... DATE	REVIEW DUE DATE
MCR	2021-MRO-TFE-000338-1	NCR00000	Registered Entity	07/12/2...	09/10/2...

The right pane is titled 'INSTRUCTIONS' and contains the text: 'TFEs and MCRs in the upper pane are currently being processed by the Region or LRE. You can access any related RFIs for this TFE by opening the TFE and scrolling to the bottom of the page.' At the bottom of the interface, there is a pagination control showing 'Page 1 of 1' with navigation icons.

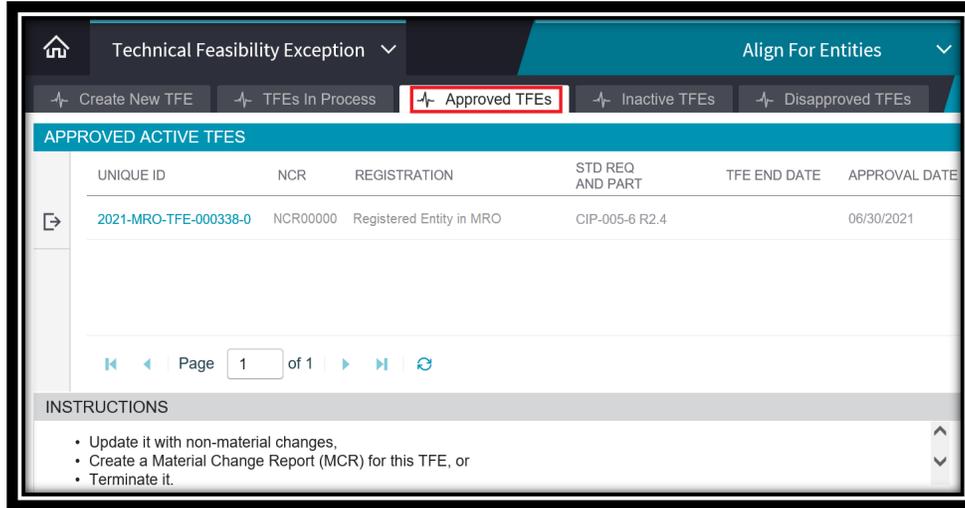
If MRO approves the MCR it will move to the Approved TFEs tab and likewise, if it is disapproved, it will move to the Disapproved TFEs tab.



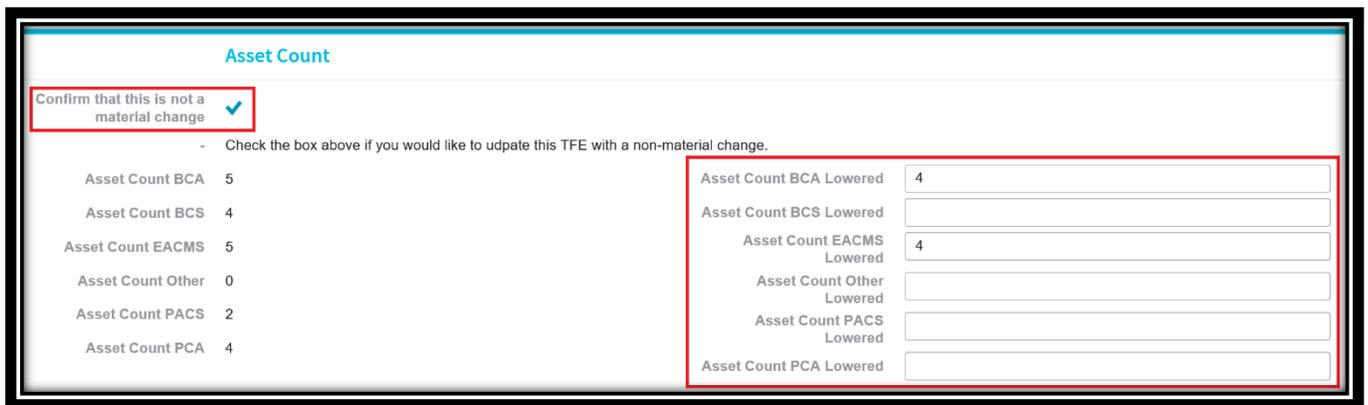
NON-MATERIAL CHANGES

Not every change to a TFE requires an MCR and/or MRO approval. In particular, reducing the number of assets covered by the TFE.

Navigate to the Approved TFEs tab, which will show the current list of approved TFEs, and from where the non-material changes will be initiated.



Click on the Unique ID for the TFE that requires changes, and this will open the TFE window. Scroll down to the Asset Count section and click the checkbox to confirm that the changes are non-material changes, and that new assets aren't being added that have not yet been approved. Once the box is checked, asset counts can be reduced.



Even though a non-material change does not require MRO to review and approve it, an updated detailed asset form will still need to be provided via the SEL. See the [Secure Evidence Locker Asset Form](#) section within this document for instructions on obtaining, and filling out a template asset form which can be used for providing additional details about the assets, and mitigating and/or compensating measures.

After lowering the asset counts for the affected device types, scroll down to the Action section, choose No Action, and click Update. Even though No Action was selected, this will save the lowered asset counts. An important point to note is that once the asset counts have been reduced through a non-material change, they cannot be increased back to the original numbers without issuing a MCR.

The screenshot shows a software interface titled "Action". Under the "Instructions" section, there are three paragraphs of text: "If you have made non-material changes, click Update to save those changes.", "If you would like to Terminate this TFE, select the Terminate action and click Update.", and "If you would like to make a Material Change Report, select the MCR action and click Update. A MCR will be saved to your Draft TFEs and MCRs, located on the Create TFE tab." To the right of the instructions is a dropdown menu with "Action" and "No Action" options. At the bottom left, there is a green "Update" button and a blue "Close" button. A red box highlights the "Action" and "No Action" options in the dropdown menu, and another red box highlights the "Update" button.

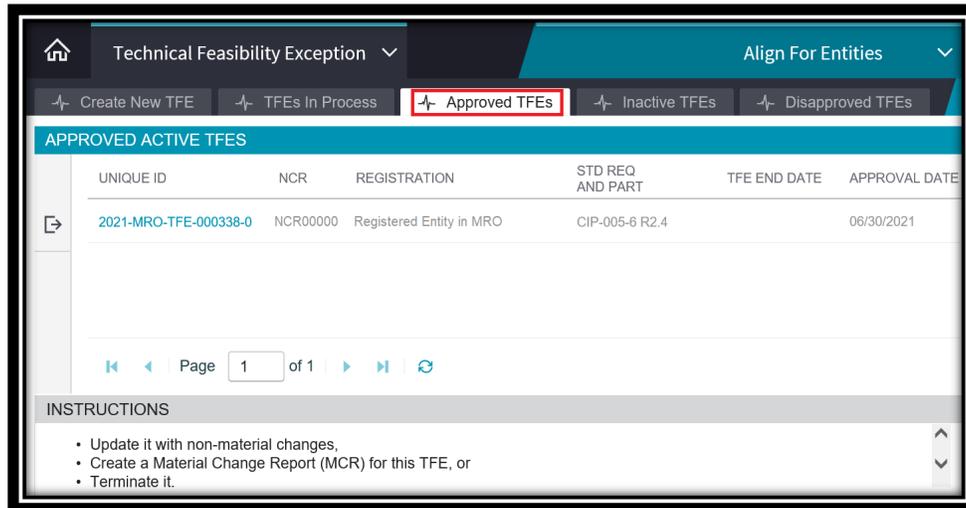
Clicking the Update button will run a validation, so if the asset counts are accidentally increased, an error message will appear. One additional item to note, a non-material change will not send notification to MRO for review.



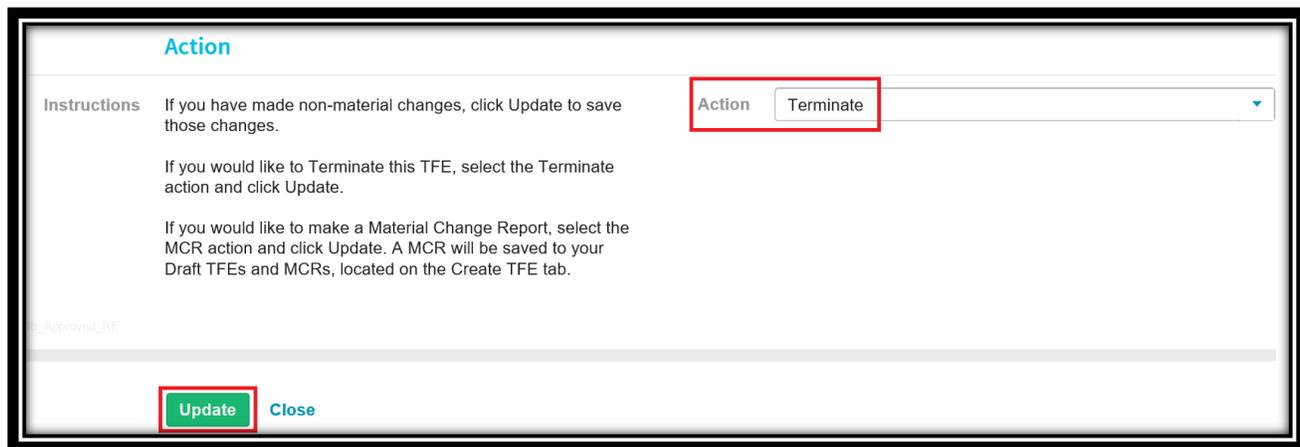
TERMINATE TFE

When a TFE is determined to no longer be necessary, it can be terminated.

Navigate to the Approved TFEs tab, which will show the current list of approved TFEs, and from where the termination will be initiated.



Click on the Unique ID for the TFE that needs to be terminated, and this will open the TFE window. Scroll down to the Action section, choose Terminate, and click Update.



There is no validation or review, and the terminated TFE will now show up on the Inactive TFEs tab. Once a TFE has been terminated, it can no longer be modified.



SECURE EVIDENCE LOCKER ASSET FORM

Download the [TFE - Asset Import SEL Template](#) spreadsheet from the [MRO website](#). This spreadsheet will support providing sensitive details about the assets and mitigating and/or compensating measures. The information being requested in the spreadsheet is required, and an updated spreadsheet should be provided for any new TFE, MCR, or non-material change. Once the spreadsheet has been filled in appropriately, it should be uploaded to the SEL following instructions listed in the Evidence section of the TFE within Align.

The TFE asset spreadsheet submitted to the SEL should be saved and maintained by the registered entity. During engagements (i.e., audits) the information may be requested again for review due to SEL retention timeframes.

