



Tips for Effective Self- Reports, Mitigation Plans, and Evidence Submittals

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Tips for Effective Self-Reports

- ✓ Identify the correct Standard version, requirement, and part
 - Version is determined by the violation start date

- ✓ Provide accurate violation start and end dates
 - Not always dictated by the discovery or reporting dates
 - Start date = when the violation began
 - Example: the date the tests should have been completed
 - End date = when the violation ended
 - Example: the date the tests were actually completed

- ✓ Provide comprehensive description of the issue (tell a story)
 - Facts – describe what happened
 - Relevant internal controls (preventative, detective, corrective)
 - Preliminary root cause determination – link back to internal controls by describing where they failed and where they succeeded

- ✓ Probability and Impact for Risk Assessment
 - Focus on *potential* risk
 - Actual risk is still relevant and should be included, but *potential* risk drives the risk determination
 - Identify where internal controls worked well to mitigate the *potential* risk

- ✓ Mitigation
 - If you plan on submitting a formal mitigation plan, you can note that in the Self-Report, but still identify steps taken to immediately address the noncompliance
 - If you plan on utilizing mitigating activities, the Mitigation section becomes even more important
 - List all actions in detail with accurate completion dates

Tips for Effective Mitigation Plans

- ✓ Effective Mitigation Plans accomplish two objectives:
 - They fix the discrete issue
 - Examples:
 - Complete the overdue test
 - Revoke the employee's unauthorized access
 - They prevent recurrence
 - Address the root cause(s)
 - Enhance preventative, detective, and corrective controls
 - Add resources, tools, and internal checks that strengthen the compliance program

- ✓ What do Case Managers look for?
 - Additional facts identified subsequent to the self-report
 - Duration, location, type of equipment involved, quantity of affected devices, etc.
 - Detailed Root Cause Analysis
 - Descriptive Milestones
 - Vague descriptions can make approval/verification difficult
 - Accurate start and end dates
 - Mitigation strategy
 - Thorough and comprehensive
 - Enhances overall reliability, security, and resilience
 - Reasonable, but aggressive timelines

Tips for Effective Evidence Submittals

- ✓ Organization is key
 - Point the reviewer to the relevant portions of the evidence (highlights, text boxes)
 - Bookmark your evidence submissions
 - Tie these bookmarks to the relevant milestone
- ✓ Provide narrative descriptions
 - Explain how each particular piece of evidence submitted demonstrates that the corresponding milestone was completed on time
- ✓ Clarity
 - Each piece of evidence should be readable
 - Avoid generic pieces of evidence that lack sufficient details such as dates, locations, names, etc.