

## Objectives

**[a]**

The types of transactions and functions that authorized users are permitted to execute are defined.

**[b]**

System access is limited to the defined types of transactions and functions for authorized users.

# AC.L2-3.1.2

## Access Control

### Transaction & Function Control

*"Limit system access to the types of transactions and functions that authorized users are permitted to execute."*

#### Key Discussion Points

##### Role-Based Access:

Access is tied to job function — what someone does determines what they can see and do, not who they know or how long they have been there.

##### Technical Enforcement:

Role definitions in policy are not enough — permissions must be configured in the system and enforced by the file server, application, or database.

##### CRUD Permissions:

Create, Read, Update, Delete — define which of these four operations each role is permitted to perform on CUI and enforce it technically.

##### Review on Role Change:

When a user changes roles, access must be recalibrated immediately — inherited permissions from old roles accumulate into over-privilege.

## Assessment Methods

### EXAMINE

Access control policy; procedures addressing access enforcement; system security plan; system design documentation; list of approved authorizations including remote access authorizations; system audit logs and records; system configuration settings and associated documentation.

### INTERVIEW

Personnel with access enforcement responsibilities; system or network administrators; personnel with information security responsibilities; system developers.

### TEST

Mechanisms implementing access control policy.

# Plain English

## What this control is really saying:

Being authorized to access the system is not the same as being authorized to do anything inside it. 3.1.2 defines what each user can actually do — read, create, update, delete — and limits their system access to exactly those functions. A machinist does not need to delete CUI files. An accountant does not need to access engineering drawings.

## How it is used:

- Active Directory security groups are defined by role — Engineers have read/write to engineering shares, accounting has no access, administrators manage configurations only.
- File share permissions enforce least-privilege by role — a manufacturing engineer can read CUI drawings but cannot delete or export them.
- When an employee changes roles, IT reviews and revises their access group memberships before the transition takes effect.
- Role definitions and associated permissions are documented in the SSP and reviewed annually.

# AC.L2-3.1.2

ACCESS CONTROL — Transaction & Function Control

## Real World Example

### The Scenario

Acme Defense has 45 employees across engineering, manufacturing, and administration. They have a Windows file server with shared folders for each department. Active Directory exists but group policies for folder access have never been configured.

### What the assessor finds

All 45 employees have full read/write access to every folder on the file server including CUI engineering drawings. The accounting clerk and shop floor supervisor have the same access to export-controlled design files as the lead engineer. No role-based access controls have ever been configured.

## SPRS Score Impact

3.1.1 carries a point value of 1. An acceptable use policy without monitoring is unenforceable — and monitoring without a defined authorized use baseline cannot reliably distinguish authorized from unauthorized activity.

## What Good Looks Like

Role-based access groups defined in AD, least-privilege permissions enforced per role, access reviewed quarterly, role changes trigger immediate access review, permissions documented in SSP.

# Common Gaps

## What assessors actually find in the field:

- ✗ **Blanket permissions**  
All 45 employees have full read/write to all shared folders including CUI engineering files — no role-based differentiation.
- ✗ **No role definitions**  
Access rights have never been formally defined — users get whatever access they ask for or inherit from previous employees.
- ✗ **Inherited access**  
Employees who changed roles still have all access from their previous position on top of their new one.
- ✗ **Excessive admin rights**  
Too many users have administrator-level access that far exceeds what their job function requires.
- ✗ **No periodic review**  
Access rights are assigned at hire and never reviewed — accumulated permissions grow unchecked over time.