

Objectives

[a]

Privacy and security notices required by CUI-specified rules are identified, consistent, and associated with the specific CUI category.

[b]

Privacy and security notices are displayed.

AC.L2-3.1.9

Access Control

Privacy & Security Notices

"Provide privacy and security notices consistent with applicable CUI rules."

Key Discussion Points

CUI-Specific Language:

[a] requires notices consistent with CUI rules for the specific category — generic acceptable use policy language is not sufficient for export-controlled or other specific CUI categories.

All Entry Points:

Every access point to CUI systems requires a notice — workstations, servers, VPN portals, and remote desktop gateways must each display one.

Pre-Logon Placement:

The notice must be displayed before login — post-login wallpaper or a notice that appears after authentication does not satisfy [b].

Legal Review Required:

v2.13 directs organizations to consult with the Office of General Counsel — banner language should be reviewed and approved by legal counsel before deployment.

Assessment Methods

EXAMINE

Privacy and security policies; procedures addressing system use notification; documented approval of system use notification messages or banners; user acknowledgements of notification message or banner; system security plan; system use notification messages; system configuration settings and associated documentation.

INTERVIEW

System or network administrators; personnel with information security responsibilities; personnel with responsibility for providing legal advice; system developers.

TEST

Mechanisms implementing system use notification.

Plain English

What this control is really saying:

Before anyone logs into a system that stores or provides access to CUI, they need to see a notice telling them the system is monitored, unauthorized use is prohibited and subject to criminal and civil penalties, and that the system contains CUI with specific DoD requirements. The notice must reflect the specific CUI category — not just generic IT acceptable use language.

How it is used:

- Legal counsel reviewed and approved the warning banner language — it references CUI, DoD requirements, monitoring, and consent, and is specific to the CUI category handled.
- A Group Policy Object displays the banner on all Windows workstations and servers before the login prompt — users must acknowledge it before accessing the system.
- The VPN portal and remote access gateway display the banner before the authentication screen — not after login.
- Where automated banners are not feasible (e.g., CNC machines), a printed notice is posted at the workstation meeting the same content requirements.

AC.L2-3.1.9

ACCESS CONTROL — Privacy & Security Notices

Real World Example

The Scenario

Acme Defense runs a Windows Active Directory domain. Employees log into workstations, access servers, and connect remotely via Cisco AnyConnect VPN. The company has a printed poster in the break room reminding employees to protect sensitive information.

What the assessor finds

No login banners exist on any workstation, server, or VPN portal. The break room poster has never been reviewed by legal counsel, does not reference CUI, and is not displayed at system access points. The VPN goes directly to the authentication screen with no pre-login notice.

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

Banner language reviewed by legal counsel and specific to CUI category, GPO-enforced pre-login banner on all workstations and servers, VPN and remote access portals display banner before authentication, printed notices at unmanned terminals meeting same content requirements.

Common Gaps

What assessors actually find in the field:

- ✗ **No login banner**
Systems have no warning banner — users log in without any notice of monitoring, CUI requirements, or consequences of unauthorized use.
- ✗ **Banner appears post-login**
A notice exists but appears after successful login as desktop wallpaper — it is not a pre-login banner and does not provide legal protection.
- ✗ **Generic IT language only**
A banner exists but uses generic acceptable use language with no reference to CUI, DoD requirements, or the specific CUI category handled.
- ✗ **Banners on workstations only**
Login banners are on workstations but not on servers, the VPN portal, or remote access gateways — entry points without banners satisfy neither [a] nor [b].
- ✗ **No legal review**
A banner exists but the language was never reviewed by legal counsel — it may not satisfy the CUI-specific notification requirements.