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**NIST Special Publication  
NIST SP 800-50r1 ipd**

# **Building a Cybersecurity and Privacy Learning Program**

Initial Public Draft

Marian Merritt  
Susan Hansche  
Brenda Ellis  
Kevin Sanchez-Cherry  
Julie Nethery Snyder  
Donald Walden

This publication is available free of charge from:  
<https://doi.org/10.6028/NIST.SP.800-50r1.ipd>

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**Building a Cybersecurity and  
Privacy Learning Program**

Initial Public Draft

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August 2023



U.S. Department of Commerce  
*Gina M. Raimondo, Secretary*

National Institute of Standards and Technology  
*Laurie E. Locascio, NIST Director and Under Secretary of Commerce for Standards and Technology*

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56 **All comments are subject to release under the Freedom of Information Act (FOIA).**

57 **Abstract**

58 This publication provides guidance for federal agencies and organizations to develop and  
59 manage a lifecycle approach to building a cybersecurity and privacy learning program (hereafter  
60 referred to as CPLP). The approach is intended to address the needs of large and small  
61 organizations as well as those building an entirely new program. The information leverages  
62 broadly accepted standards, regulations, legislation, and best practices. The recommendations are  
63 customizable and may be implemented as part of an organization-wide process that manages  
64 awareness, training, and education programs for a diverse set of employee audiences. The  
65 guidance also includes suggested metrics and evaluation methods in order that the program be  
66 regularly improved and updated as needs will evolve.

67 **Keywords**

68 awareness; cybersecurity; education; learning program; privacy; role-based; training.

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106	<b>Table of Contents</b>	
107	<b>Executive Summary</b> .....	<b>1</b>
108	<b>1. Introduction</b> .....	<b>3</b>
109	1.1. Purpose .....	3
110	1.2. Scope .....	5
111	1.3. The CPLP Life Cycle .....	5
112	1.4. Developing a Cybersecurity and Privacy Culture .....	6
113	1.5. Relationship Between Cybersecurity and Privacy .....	7
114	1.6. Privacy Risk Management Concepts to Emphasize .....	9
115	1.7. Coordinating Cybersecurity and Privacy Learning Efforts .....	10
116	1.8. Roles and Responsibility .....	10
117	1.8.1. Organization Head .....	11
118	1.8.2. Senior Leadership .....	11
119	1.8.3. Learning Program Manager .....	12
120	1.8.4. Managers .....	12
121	<b>2. The CPLP Plan and Strategy</b> .....	<b>14</b>
122	2.1. Building the Strategic Plan .....	14
123	2.2. Develop CPLP Policies and Procedures .....	15
124	2.3. Aligning Strategies, Goals, Objectives, and Tactics .....	17
125	2.4. Determining CPLP Measurements and Metrics .....	19
126	2.5. Learning Program Participants .....	21
127	2.5.1. All Users .....	22
128	2.5.2. Privileged Users .....	22
129	2.5.3. Staff with Significant Cybersecurity or Privacy Responsibilities .....	23
130	2.5.4. Determining Who Has Significant Cybersecurity and Privacy Responsibilities .....	23
131	2.6. Determining Scope and Complexity .....	24
132	2.7. The CPLP Elements .....	24
133	2.7.1. Awareness Activities .....	25
134	2.7.2. Practical Exercises .....	25
135	2.7.3. Training .....	26
136	2.8. Establishing the CPLP Plan Priorities .....	27
137	2.9. Developing the CPLP Plan .....	28
138	2.10. CPLP Resources .....	28
139	2.10.1. Establishing a CPLP Budget .....	28
140	2.10.2. CPLP Staff and Locations .....	30
141	2.11. Communicating the Strategic Plan and Program Performance .....	30

142	<b>3. Analysis and Design of the CPLP .....</b>	<b>33</b>
143	3.1. Analysis Phase .....	33
144	3.1.1. The Importance of the Analysis Phase .....	34
145	3.1.2. The Steps of the Analysis Phase .....	34
146	3.2. Designing the CPLP .....	38
147	3.2.1. The Steps of the Design Phase .....	38
148	3.2.2. Design Document .....	38
149	3.3. Conduct an Environmental Scan of Available Training.....	39
150	3.3.1. External Sources of CPLP Material .....	39
151	3.3.2. Internal Sources of CPLP Material.....	40
152	3.4. Identify Learning Objectives: From Analysis to Design .....	40
153	3.4.1. Examples of Identifying Learning Objectives .....	40
154	3.5. Summarize CPLP or Element Requirements .....	42
155	<b>4. Development and Implementation of the CPLP .....</b>	<b>44</b>
156	4.1. Developing CPLP Material.....	44
157	4.1.1. Create a Requirements Document for Sourcing New Material.....	44
158	4.1.2. Developing the All User Learning Program.....	45
159	4.1.3. Developing a Privileged Users Learning Program .....	46
160	4.1.4. Developing a Learning Program for Those With Significant Cybersecurity and	
161	Privacy Responsibilities .....	47
162	4.2. Implementing New CPLP Elements .....	47
163	4.2.1. Steps for Implementing a new CPLP Element .....	47
164	4.3. Communicating the CPLP Implementation .....	48
165	4.4. Establishing Reporting and Metrics Requirements for CPLP Elements.....	49
166	4.5. Building a CPLP Schedule.....	49
167	4.6. Determining Post-Implementation Activities.....	50
168	<b>5. Assessment and Improvement of the CPLP.....</b>	<b>51</b>
169	5.1. Steps for Assessing and Improving the CPLP.....	51
170	5.2. Create a CPLP Assessment Report.....	51
171	5.2.1. Compliance Reporting .....	52
172	5.3. Evaluating CPLP Effectiveness .....	52
173	5.3.1. Instructor Evaluation.....	53
174	5.3.2. Learner Performance and Feedback .....	53
175	5.3.3. Review of the CPLP Assessment Report With Senior Leadership .....	54
176	5.4. Continuous Monitoring and Improvement .....	54
177	<b>References .....</b>	<b>55</b>

178	<b>Appendix A. Examples of Cybersecurity and Privacy Learning Program Maturity Levels</b>	
179		<b>57</b>
180	<b>Appendix B. Glossary</b> .....	<b>60</b>
181	<b>List of Tables</b>	
182	<b>Table 1.</b> Elements of a CPLP strategy .....	<b>17</b>
183	<b>List of Figures</b>	
184	<b>Fig. 1.</b> The Cybersecurity and Privacy Learning Program Life Cycle.....	<b>6</b>
185	<b>Fig. 2.</b> Cybersecurity and privacy risk relationship [5] .....	<b>8</b>
186	<b>Fig. 3.</b> Relationship between privacy risk and organizational risk [5].....	<b>10</b>
187	<b>Fig. 4.</b> CPLP Learning Program participants .....	<b>21</b>
188		

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196

## 197 **Executive Summary**

198 Ensuring that an organization’s workforce is aware of and prepared to respond appropriately and  
199 effectively to cybersecurity and privacy risk is an important effort that requires a strategic  
200 approach based on thoughtful planning, resource considerations, and leadership-driven decision  
201 making. This long-awaited update to the 2003 NIST Special Publication (SP) 800-50, *Building*  
202 *an Information Technology Security Awareness and Training Program*, provides guidance that  
203 includes awareness, role-based training, and education programs. These programs combine to  
204 create an overall Cybersecurity and Privacy Learning Program (CPLP) that supports federal  
205 requirements and incorporates industry-recognized best practices for risk management.

206 Legislative authority for the creation and maintenance of this Special Publication is derived from  
207 the National Defense Authorization Act of 2021 (NDAA) [2].

208 In addition to the statutory responsibilities under FISMA, this Special Publication supports the  
209 National Defense Authorization Act of 2021 (NDAA) [2], *Development of Standards and*  
210 *Guidelines for Improving Cybersecurity Workforce of Federal Agencies* to “publish standards  
211 and guidelines for improving cybersecurity awareness of employees and contractors of Federal  
212 agencies”<sup>1</sup> Including privacy as a foundational element in this Program reflects the guidance  
213 found in the 2016 update to OMB’s Circular A-130:

214 ...it also emphasizes the role of both privacy and security in the federal  
215 information life cycle. Importantly, the inclusion of privacy represents a  
216 shift from viewing security and privacy requirements as merely  
217 compliance exercises to understanding security and privacy as crucial  
218 and related elements of a comprehensive, strategic, and continuous risk-  
219 based program at federal agencies. [1]

220 Additionally, this update includes elements previously found in NIST SP 800-16, *Information*  
221 *Technology Security Training Requirements: A Role- and Performance-Based Model* [6].  
222 Previously, NIST SP 800-16 [6] identified the federal agency and organizational work roles that  
223 required specialized training for cybersecurity tasks and skills. The relevant content from NIST  
224 SP 800-16 has been incorporated into this publication or has been included in NIST SP 800-  
225 181r1 [3]. As a result, NIST SP 800-16 will be withdrawn upon the release of this publication

226 Everyone in an organization has a role to play in the success of an effective cybersecurity and  
227 privacy program. For those whose information technology, cybersecurity, or cybersecurity-  
228 related job responsibilities require additional or specific training, the NICE Workforce  
229 Framework for Cybersecurity (NICE Framework)<sup>2</sup> [3] identifies the specific knowledge and  
230 skills necessary to perform tasks associated with work roles in these areas.<sup>3</sup>

---

<sup>1</sup> Section 9402 of FY 21 NDAA, *Development of Standards and Guidelines for Improving Cybersecurity Workforce of Federal Agencies*, amends the NIST Act as follows: “(b): PUBLICATION OF STANDARDS AND GUIDELINES ON CYBERSECURITY AWARENESS. Not later than three years after the date of the enactment of this Act, the Director of the National Institute of Standards and Technology shall publish standards and guidelines for improving cybersecurity awareness of employees and contractors of federal agencies.”

<sup>2</sup> National Initiative for Cybersecurity Education (NICE) is led by NIST in the US Department of Commerce.

<sup>3</sup> As of the time of development of this publication, NIST is in the process of a privacy workforce development effort to create a privacy companion to NICE.

231 Users of this publication will find guidance on the steps necessary to:

- 232 • Build an effective CPLP for all organizational personnel, including employees and  
233 contractors
- 234 • Identify personnel who require advanced training
- 235 • Create a methodology for evaluating the program
- 236 • Engage in ongoing improvement to the program

237 Throughout each section, there are recommendations to enable a program to continually evolve  
238 and improve, thereby minimizing risks to the organization.

239 This document identifies the phases in the management of a CPLP and is organized as follows:

- 240 • Section 1: Introduction
- 241 • Section 2: The CPLP Strategy and Planning Process
- 242 • Section 3: Analyzing and Designing the CPLP
- 243 • Section 4: Development and Implementation of the CPLP
- 244 • Section 5: Assessing and Improving the CPLP

## 245 1. Introduction

246 Ongoing cybersecurity and privacy risks require continuous attention. An organization must  
247 enlist participation from everyone to reduce and manage its risk. A key component of an  
248 organization’s cybersecurity and privacy plans are the Learning Program(s), which helps to build  
249 an understanding of risks and explain everyone’s role in identifying, responding to, and  
250 managing those risks. While Learning Programs vary in each organization, there are fundamental  
251 shared elements that can be utilized to create the Cybersecurity and Privacy Learning Program  
252 (CPLP) strategy and establish support for implementation, evaluation, and reporting activities.

253 For ease of use, the remainder of this document will use the term “CPLP” to refer to all elements  
254 of cybersecurity and privacy awareness activities and campaigns, including awareness training,  
255 practical exercises (e.g. table-top exercises, cyber ranges, or phishing campaigns), topic-based  
256 training, role-based training, and education programs.

257 The previous version of this Special Publication defined awareness, training, and education as  
258 separate elements in a learning continuum. Research efforts [10] conducted with Federal  
259 Government training managers have shown that these terms have different meanings and can  
260 lead to confusion when describing the broader purpose of building a CPLP. While managers may  
261 refer to programs as “awareness and training” or “awareness training,” the terms are applied  
262 inconsistently across organizations. Regardless of what the organization calls its program, the  
263 overarching goal is to provide opportunities for learning at all levels or stages of one’s career. It  
264 is about creating programs where learning can take place.

265 NIST SP 800-181r1, *NICE Workforce Framework for Cybersecurity (NICE Framework)* [3],  
266 refers to an individual who is acquiring specialized knowledge or developing skill as a “learner.”  
267 This terminology is useful here as well, so this document will refer to the program as a CPLP or  
268 CPLPs, as some organizations may require multiple Programs. Additionally, some organizations  
269 may have separate CPLPs.

### 270 1.1. Purpose

271 This document provides guidelines for building and maintaining comprehensive cybersecurity  
272 and privacy learning programs (CPLPs) that include awareness activities and campaigns,  
273 awareness training, practical exercises, topic-based training, role-based training, and education  
274 programs. The document includes guidance on how an organization can create a strategic  
275 program plan and ensure that there are appropriate resources to meet the organization’s learning  
276 goals.

277 This publication is intended to serve a diverse audience, including:

- 278 • **Workforce and learning professionals:** This group includes human resource planners,  
279 training coordinators, curriculum developers, course developers, and those responsible  
280 for developing, presenting, and evaluating the training. This document will assist training  
281 professionals with the following: understanding cybersecurity and privacy requirements,  
282 knowledge, and skills; evaluating the course quality; obtaining the appropriate courses  
283 and materials; developing or customizing courses and materials; and tailoring their  
284 teaching approaches to achieve the desired learning objectives. Workforce and learning  
285 professionals includes:

- 286 ○ Individuals associated with the design, development, implementation, assessment,  
287 operation, management, and ongoing improvements to the CPLPs for federal agencies  
288 and organizations
- 289 ○ Individuals with human resources and talent management responsibilities as well as  
290 oversight responsibilities for contractors and training programs
- 291 ○ Individuals responsible for the CPLPs, training professionals, and managers, such as  
292 Chief Learning Officers and curriculum developers
- 293 ● **Leadership and management:** This includes all levels of management who are  
294 responsible for staff training needs, prioritizing the use of training resources, identifying  
295 training gaps, and evaluating training effectiveness within the workspace. Leadership and  
296 management includes:
  - 297 ○ Individuals with information system oversight or governance responsibilities, such as  
298 senior leaders, risk executives, authorizing officials, chief information officers (CIO),  
299 chief information security officers (CISO), data management officers, and chief  
300 privacy officers (CPO)
  - 301 ○ Individuals with cybersecurity and privacy management responsibilities (e.g.,  
302 managing programs and projects and ensuring that staff members have the  
303 appropriate knowledge and skills to perform their work roles), including program and  
304 project managers, cybersecurity managers, and security operation managers
- 305 ● **Cybersecurity and privacy specialists:** This group includes workforce members who  
306 are responsible for assisting in identifying CPLP activities and aids as a subject-matter  
307 expert (SME), meeting the requirements of the roles or job functions, identifying learning  
308 gaps and needs within the organization’s cybersecurity and privacy program, determining  
309 necessary customizations, and developing a compliance baseline for the organization.
- 310

#### Key Considerations for Cybersecurity and Privacy Learning Programs<sup>4</sup>

- Develop, maintain, and implement mandatory organization-wide cybersecurity and privacy learning programs for all members of the workforce that support enterprise cybersecurity and privacy goals and objectives.
- Ensure that the CPLP aligns with established rules of behavior and is consistent with applicable policies, standards, and guidelines.
- Apprise the workforce of available cybersecurity and privacy resources, such as products, techniques, or expertise.
- Provide foundational as well as more advanced levels of cybersecurity and privacy training to the workforce and ensure that measures are in place to assess the knowledge and skill of participants.
- Identify who needs specialized cybersecurity and privacy training based on assigned cybersecurity and privacy roles and responsibilities.

<sup>4</sup> This text is adapted from OMB A-130, Appendix I, Section 4.h, and is meant to accommodate the needs of any organization, not just federal agencies and organizations.

311

312 **1.2. Scope**

313 The scope of this guide covers the steps that an organization should take to create a strategy and  
314 program plan, including the design, development, implementation, and maintenance of a CPLP  
315 as part of an enterprise cybersecurity and privacy program. The scope includes identifying the  
316 learning needs for the personnel of an organization, from federal and contract employees to  
317 supervisors, functional managers, and executive-level managers. As noted previously, CPLPs are  
318 inclusive of various other programs, including awareness programs, social engineering  
319 campaigns, new hire training, annual training, technical training and requirements for role-based  
320 training, and other relevant learning activities. These learning activities may be conducted within  
321 the organization or necessitate access to external resources, such as courses, certificates, and  
322 advanced programs.

323 **1.3. The CPLP Life Cycle**

324 The CPLP must have an actively managed plan, which requires attention and adjustment over  
325 time, throughout the Life Cycle. Learning Program Managers should carefully and thoughtfully  
326 outline, discuss, review, and document the CPLP's goals and available options. When the owners  
327 of the organization's CPLP adopt an effective strategy and develop a proper planning approach  
328 with measurement and feedback through the year, the entire organization remains connected to  
329 the CPLP objectives. **Fig. 1** shows the various phases of building and managing a Learning  
330 Program: Plan and Strategy, Analysis and Design, Development and Implementation,  
331 Assessment and Improvement.



332

333

**Fig. 1.** The Cybersecurity and Privacy Learning Program life cycle

334 These phases can occur in sequence or simultaneously. At any time during the life cycle, the  
335 Learning Program Manager and team can develop curriculum, evaluate instructor feedback, send  
336 out practical exercise email quizzes, design posters for awareness, or develop a presentation for  
337 senior leadership. Consider this diagram a reminder of the breadth of work.

338 In a broad sense, the CPLP is a valued element of the organization’s learning culture. To be  
339 effective, the CPLP must be linked to organizational goals and viewed as adaptive, continuous,  
340 and evolving. In a learning organization, personnel can expand and enhance their current  
341 capabilities to understand and meet new mission requirements. Personnel are respected for their  
342 ability to create and inspire others and are active in creating life-long learning achievements. If  
343 an organization offers other learning programs (e.g., career development, leadership, and  
344 executive development), the CPLP needs to be similarly integrated into the enterprise-wide  
345 learning structure.

#### 346 **1.4. Developing a Cybersecurity and Privacy Culture**

347 Establishing a cybersecurity and privacy culture is an important component of establishing a  
348 successful CPLP. The culture of the organization should emphasize, reinforce, and drive its  
349 desired behaviors toward cybersecurity and privacy. When a CPLP is valued in the  
350 organization’s culture, the ability to address risks is increased. The organization’s leaders are  
351 strategically valuable in establishing the CPLP as a significant component of managing risk.  
352 Leaders create a learning culture by supporting and championing learning activities, from  
353 awareness campaigns to role-based training. They help to set the tone for the entire organization.

354 The Government Accountability Office (GAO)<sup>5</sup> noted that in FY 2021 federal civilian agencies  
355 reported 32,511 information security incidents. The largest identified percentage (31 %) of  
356 reported incidents were from improper usage and 9 % were from email phishing (46 % are  
357 shown as “unknown”). Improper usage is defined as “any incident resulting from violation of an  
358 organization’s acceptable usage policies by an authorized user.” While these statistics may  
359 change from year to year, the high level of incidents from improper usage demonstrates the need  
360 for CPLPs. To reduce improper use, it is crucial that every user receives training on the rules of  
361 behavior and their role in reducing the risks associated with the organization’s data and systems.

362 To support an inclusive culture, the approach in any CPLP should focus on helping the learner  
363 understand their role in the organization with respect to their cybersecurity and privacy  
364 responsibilities. The content should indicate to the learner that they are a valued participant in  
365 helping the organization manage risk. The workforce appreciates that they will contribute to the  
366 organization’s positive cybersecurity and privacy culture with the knowledge and skills they  
367 acquire by participating in the CPLP. The stereotypes of “hackers in hoodies” and myth of  
368 “technologies solving the problem” are dated. People are an organization’s greatest asset. Any  
369 effective learning activity can be incorporated into the CPLP when it is respectful and inclusive.

370 A cybersecurity and privacy culture supports an environment where – from executives to every  
371 user – the workforce is well-versed in the cybersecurity and privacy risk management needs,  
372 expectations, and values of their organization and understands their roles and responsibilities for  
373 meeting them. An organization supports an effective cybersecurity and privacy culture when it  
374 understands the needs of the workforce and provides education and training to help employees  
375 and contractors learn expected cybersecurity and privacy behaviors.

376 Organizations and system owners must develop a CPLP approach that champions every user’s  
377 responsibility to protect information and assets. It is important to recognize how new  
378 technologies and new risks will continue to necessitate an organization-wide approach to  
379 managing cybersecurity and privacy risks. The NIST Cybersecurity Framework [4], Privacy  
380 Framework [5], and the Risk Management Framework (RMF) [7] highlight the importance of  
381 awareness and training for personnel.

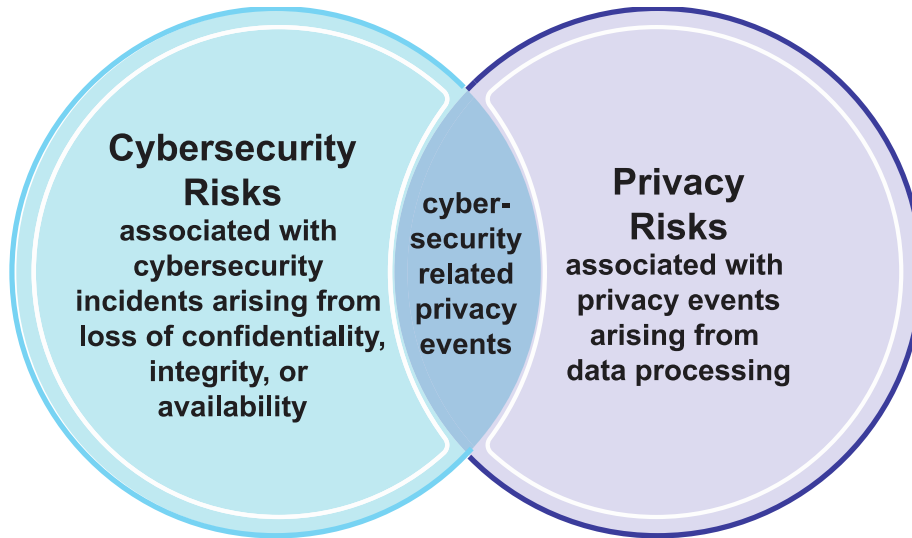
## 382 **1.5. Relationship Between Cybersecurity and Privacy**

383 While cybersecurity and privacy are independent and separate disciplines, some of their  
384 objectives are overlapping and complementary. Cybersecurity programs are responsible for  
385 protecting information and information systems as well as operational technologies from  
386 unauthorized access, use, disclosure, disruption, modification, or destruction (i.e., unauthorized  
387 system activity or behavior) in order to provide confidentiality, integrity, availability and safety.  
388 Privacy programs are responsible for managing the risks to individuals associated with data  
389 processing throughout the information life cycle<sup>6</sup> in order to provide predictability,  
390 manageability, and disassociability, as well as ensuring compliance with applicable privacy  
391 requirements. Managing cybersecurity risk contributes to managing privacy risk. However,  
392 managing cybersecurity risk alone is not sufficient, as privacy risks can also arise by means  
393 unrelated to cybersecurity incidents, as illustrated by **Fig. 2**.

---

<sup>5</sup> See <https://www.gao.gov/cybersecurity>.

<sup>6</sup> “The information life cycle describes the stages through which information passes, typically characterized as creation or collection, processing, dissemination, use, storage, and disposition, to include destruction and deletion [OMB A-130]”



394

395

**Fig. 2.** Cybersecurity and privacy risk relationship [5]

396 For example, the Privacy Act requires federal agencies to disclose much of the information about  
397 individuals in their records when the individual requests it. However, if the organization’s cybersecurity  
398 posture does not allow for the efficient sharing of information, individuals risk privacy violations because  
399 they may experience problems or harms resulting from their inability to know what information is held  
400 about them.

401 Providing the workforce with a general understanding of the different origins of cybersecurity and privacy  
402 risks is important for enabling them to effectively address the risks they encounter in their daily activities.  
403 For example, all members of the workforce will need training that helps them understand when a privacy  
404 event has occurred, and incident response professionals will need training that helps them determine when  
405 a cybersecurity incident may also be a privacy event, which often requires additional procedures when  
406 responding (e.g., determining if an unsecured site resulted in an actual data breach of PII). Organizations  
407 can benefit from taking a coordinated approach to developing CPLPs and have the flexibility to determine  
408 how to effectively do so to meet the organization’s needs.<sup>7</sup>

409 Once an organization understands the relationship between cybersecurity and privacy in its context, it can  
410 determine its approach to developing both integrated and cybersecurity- or privacy-specific learning  
411 activities based on the relevant topics and workforce roles in the environment. For example, the  
412 organization can determine how to effectively:

- 413 • Associate learning tracks with work roles and job performance
- 414 • Describe its approach to managing cybersecurity and privacy risk in a way that aligns with  
415 enterprise risk management capabilities
- 416 • Incorporate lessons learned from cybersecurity and privacy risk, audit findings, incidents, or  
417 events, or changes to governance documents (e.g., laws, regulations, policies, and standards) into  
418 general and role-based training

---

<sup>7</sup> Role-based privacy training should address the full scope of privacy risks, as depicted in **Fig. 1**. For federal agencies, role-based privacy training addresses the types of information that may constitute personally identifiable information and the risks, considerations, and obligations associated with its processing. Such training also considers the authority to process personally identifiable information documented in privacy policies and notices, system of records notices, computer matching agreements and notices, privacy impact assessments, Privacy Act statements, contracts, information sharing agreements, memoranda of understanding, or other documentation.

- 419 • Institute learning activities that are appropriate for both internal and external members of the  
420 workforce, including contractors and third parties
- 421 • Identify learning obligations in contracts and agreements
- 422 • Identify and track metrics to assess the effectiveness of learning efforts (e.g., determining whether  
423 the number of a certain type of incident or event decreases after a targeted awareness campaign)

## 424 **1.6. Privacy Risk Management Concepts to Emphasize**

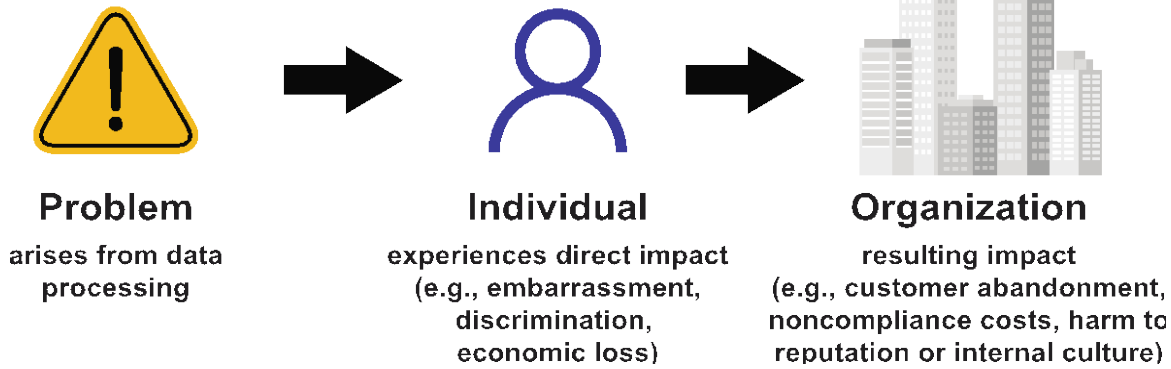
425 Members of the workforce who are in roles that can impact privacy must also have a clear  
426 understanding of how to identify and address privacy risk that may arise.

427 The NIST Privacy Framework [5] provides a common language for understanding, managing,  
428 and communicating privacy risk. Just as the workforce considers the risk associated with security  
429 incidents, they must also consider *privacy events* – the potential problems that could arise from  
430 system, product, or service operations with data, whether in digital or non-digital form, through a  
431 complete life cycle from data collection through disposal. Privacy problems can arise from an  
432 individual’s direct use of a product. Some problems can also arise simply from individuals’  
433 interactions with systems, products, and services, even when the data being processed is not  
434 directly linked to identifiable individuals. The problems that individuals can experience as a  
435 result of data processing can be expressed in various ways. The NIST Privacy Framework  
436 describes them as ranging from dignity-type effects (e.g., embarrassment or stigmas) to more  
437 tangible harms (e.g., discrimination, economic loss, or physical harm).<sup>8</sup>

438 As a result of the problems that individuals experience, an organization may in turn experience  
439 impacts such as noncompliance costs, revenue loss arising from customer abandonment of  
440 products and services, or harm to its external brand reputation or internal culture. Organizations  
441 commonly manage these types of impacts at the enterprise risk management level. By connecting  
442 problems that individuals experience to these well-understood organizational impacts,  
443 organizations can bring privacy risk into parity with other risks that they manage in their broader  
444 portfolio and drive more informed decision-making about resource allocation to strengthen  
445 privacy programs. **Fig. 3** illustrates the relationship between privacy risk and organizational risk.

---

<sup>8</sup> The NIST Catalog of Problematic Data Actions and Problems provides examples of privacy problems that individuals may face and is available at <https://github.com/usnistgov/PrivacyEngCollabSpace/blob/master/tools/risk-assessment/NIST-Privacy-Risk-Assessment-Methodology-PRAM/catalog-PDAP.md>.



446

447

448

**Fig. 3.** Relationship between privacy risk and organizational risk [5]

449 Privacy Learning Programs are most effective when they help the workforce understand both the  
450 direct impacts that organizational activities can have on individuals and the resulting impacts that  
451 privacy risks can have on the organization. For example, the program can address the types of  
452 impacts that an individual may experience from the loss of personal information (e.g., identity  
453 theft) and the resulting consequences to the organization (e.g., costs associated with a data  
454 breach, such as providing credit monitoring to customers, loss of trust in the organization, or  
455 decline in value of stock share price).

### 456 **1.7. Coordinating Cybersecurity and Privacy Learning Efforts**

457 An organization's CPLP should coordinate with the cybersecurity and privacy program(s). As  
458 discussed in Section 1.4, cybersecurity and privacy risk management practices may overlap with  
459 learning needs. With limited resources, duplicating efforts will negatively affect one or both  
460 programs. In cases with an integrated cybersecurity and privacy program, this is less likely to be  
461 an issue.

462

### 463 **1.8. Roles and Responsibility**

464 While it is important to understand the policies that require agencies to develop and implement  
465 CPLPs, it is also crucial that organizations understand who has responsibility for cybersecurity  
466 and privacy learning. This section identifies and describes those within an organization who are  
467 responsible for ensuring that the workforce has access to and completes their cybersecurity and  
468 privacy learning.

469 It may be useful to refer to related NIST Special Publications for consistent references to the  
470 crucial roles in an organization that have a vested interest in the implementation of a robust  
471 CPLP. NIST SP 800-37 [7] identifies the typical roles associated with these programs. Since  
472 terminology may vary by organization, it can be useful to refer to the NICE Framework as a  
473 complementary tool for identifying those with responsibilities for managing the CPLP as well as  
474 those who require additional training.

475 The size, maturity, and resources of CPLPs can also vary widely, even within components of the  
476 same organization. The roles and responsibilities for key positions in a CPLP should be  
477 documented to help ensure the most effective use of resources and enable the program to mature  
478 to its desired state.

### 479 **1.8.1. Organization Head**

480 Organization heads must prioritize the development of an effective CPLP. This includes  
481 implementing a viable cybersecurity and privacy program with a strong learning component.  
482 Organization heads should:

- 483 • Designate leadership roles to manage the organization’s cybersecurity and privacy  
484 learning programs. Empower these roles to develop the strategic direction for the learning  
485 program; performance goals and objectives are written; and performance metrics are  
486 reviewed and managed. Learning Program Managers, who are responsible for the  
487 analysis, design, development and delivery of the CPLP, are identified and given  
488 resources adequate to meet the performance goals and objectives
- 489 • Ensure that an agency- or organization-wide cybersecurity and privacy program is  
490 implemented, well-supported by resources, including personnel and funding, and  
491 effective at reducing and managing risk
- 492 • Ensure that the agency or organization has enough sufficiently knowledgeable and skilled  
493 personnel to support its programs and resources and individuals’s privacy

### 494 **1.8.2. Senior Leadership**

495 FISMA [9], OMB A-130 [1], and various other regulations designate the responsibility for  
496 ensuring cybersecurity and privacy learning programs to certain senior official positions, such as  
497 the Chief Information Officer, Chief Privacy Officer, Chief Information Security Officer, and  
498 Chief Data Officer. These roles are tasked with setting strategic direction, ensuring resources are  
499 available, and overseeing personnel with significant responsibilities for cybersecurity and  
500 privacy, including the roles found in the NICE Framework [3]. Senior officials should work with  
501 their Learning Program Managers to:

- 502 • Establish an overall strategy for the CPLPs
- 503 • Provide resource support for the implementation of the CPLPs’ life cycle phases
- 504 • Recognize any deficiencies in the organizational culture, risks, or requirements and  
505 address them with appropriate program funding and management

506 In addition, senior leaders must champion workforce requirements, such as:

- 507 • Leading by example and participating in their own CPLP training, as required.
- 508 • Identifying who has cybersecurity and privacy responsibilities and documenting it in  
509 position descriptions or other relevant work and performance requirement statements
- 510 • Identifying relevant learning requirements and documenting it in individual development  
511 plans or other career pathway documentation

- 512 • Establishing policies and procedures for learning programs and documenting it in the  
513 organizational records

514 A recommended approach for an agency or organization would be to form a Senior Leadership  
515 Committee that meets regularly with Learning Program Managers to discuss strategy and provide  
516 resource support. The Learning Program Manager will provide the Senior Leadership Committee  
517 with regular reports on the Learning Program’s performance throughout the year.

### 518 **1.8.3. Learning Program Manager**

519 Learning Program Managers have tactical-level responsibilities for the CPLP. In this role, the  
520 Program Manager should, in consultation with the curriculum development professionals and  
521 curriculum instruction team:

- 522 • Facilitate the development of learning material that is appropriate and timely for the  
523 intended audiences
- 524 • Provide effective mechanisms for deploying the learning material so that it reaches the  
525 intended audience
- 526 • Offer users and managers an effective way of providing feedback on the learning material  
527 and its presentation
- 528 • Oversee periodic reviews and update the learning material when necessary
- 529 • Assist in establishing a tracking and reporting strategy
- 530 • Assist in identifying who has significant cybersecurity and privacy responsibilities
- 531 • Provide senior leadership with regular status reports on the CPLP’s goals, objectives, and  
532 performance metrics

### 533 **1.8.4. Managers**

534 The term “Managers” includes supervisors and those who have organizational responsibilities for  
535 ensuring compliance with cybersecurity and privacy learning requirements for personnel who  
536 report to them. Managers should:

- 537 • Work with the CIO and Learning Program Managers to fulfill shared responsibilities
- 538 • If serving in the role of system owner or data owner, designate staff who have significant  
539 cybersecurity or privacy responsibilities on their system (e.g., general support systems  
540 and major applications) and ensure that users of their system are appropriately trained in  
541 how to fulfill their responsibilities before being granted access to system resources.
- 542 • Develop individual development plans (IDPs) for personnel in roles with significant  
543 cybersecurity and privacy responsibilities (these IDPs will provide guidance for assessing  
544 the knowledge gaps of those with significant cybersecurity and privacy responsibilities)
- 545 • Promote the professional development of personnel with cybersecurity and privacy  
546 responsibilities and encourage them to acquire industry-recognized certifications

- 547       • Ensure that personnel understand the specific rules of each system and application that  
548       they use
- 549       • Work to reduce errors and omissions by personnel that might be caused by a lack of  
550       awareness or training
- 551
- 552

## 553 **2. The CPLP Plan and Strategy**

554 A CPLP strategic plan benefits the organization by providing an organization-wide view of the  
555 current state of its cybersecurity and privacy learning, where the organization wants to or needs  
556 to be, and how to address the gap between the two states (e.g., resources, staffing.) The strategic  
557 plan helps the Learning Program Manager balance their daily responsibilities in ensuring that the  
558 organization’s personnel are ready to meet the challenges of the cybersecurity and privacy risks  
559 associated with their work.

560 The Office of Management and Budget (OMB) Circular A-130 [1] establishes general policy for  
561 the planning, budgeting, governance, acquisition, and management of federal information,  
562 personnel, equipment, funds, IT resources, and supporting infrastructure and services. Each  
563 federal agency is required to develop, maintain, and implement a comprehensive CPLP to meet  
564 its mission needs. To develop a robust program that includes a variety of materials, including  
565 offering learners engaging opportunities to stay current on relevant cybersecurity and privacy  
566 risks to their organization, the CPLP must have an effective strategy for development,  
567 implementation, and continual improvement.

568 This section discusses the steps involved in building a Strategic Plan that takes the organization’s  
569 objectives, unique requirements, audience types, and program scope into consideration. The  
570 planning stages will also help the organization evaluate priorities, budget, resources, and  
571 communication plans.

### 572 **2.1. Building the Strategic Plan**

573 The CPLP must intersect with the organization’s strategic plan for continual development of the  
574 workforce. The owner of the CPLP should understand the structure and mission of the  
575 organization to determine where the strategy originates. Some agencies are organized with a top-  
576 down approach, where a headquarters function owns the mission and provides guidance on the  
577 program strategy. Other organizations develop CPLPs in various business functions or combine  
578 both approaches. Documenting the program and how it supports the goals of the risk  
579 management strategy shows executive leadership why the program is needed. A well-developed  
580 strategic plan describes how an organization’s risk management and workplace learning culture  
581 enable all personnel to assess risk with their every action and decision. With agencies of varying  
582 sizes, a program that works for one will not necessarily work for another. Each agency must  
583 identify the best program that will work for them since one size does not fit all.

584 The CPLP Strategy should always be clearly stated and will most likely be reviewed by the  
585 Senior Leadership Committee and agreed upon before any funding is approved. The strategic  
586 plan describes how the CPLP supports and aligns with the overall organizational risk  
587 management and workforce learning strategy.

588 Key items to address in the CPLP Strategy include:

- 589 • Vision and mission
- 590 • Strategic goals and objectives
- 591 • Training Approaches and Action plans
- 592 • Tactics

- 593       • Metrics and reporting
- 594    The CPLP Strategy should also:
- 595       • Describe how it supports a culture of risk-based decision making and emphasize the  
596       importance of transformational workforce learning, including the development of  
597       knowledge, skills, and the capabilities to help workers succeed now and in the future
- 598       • Explain how the program will meet knowledge and skill gaps, enhance overall  
599       capabilities, and support a culture of personnel engagement in their cybersecurity and  
600       privacy roles
- 601       • Intersect with the overall mission of the organization (e.g., mission and vision statements,  
602       risk tolerance, learning goals and methods, and organizational structure)
- 603       • Include information about organizational policies and policy owners, such as how  
604       existing rules of behavior, policies, procedures, and guidance will be communicated to  
605       personnel
- 606       • Include metrics and measures that help determine whether the program is meeting its  
607       goals
- 608       • Include operational tactics, such as the tools, mechanisms, or methods that the program  
609       owners will leverage to achieve program objectives
- 610       • Identify key stakeholders, leaders, and roles, many of whom will be within the offices of  
611       the Chief Information Officer (CIO), Chief Information Security Officer (CISO), Senior  
612       Agency Information Security Officer (SAISO), Senior Agency Official for Privacy  
613       (SAOP), or Chief Privacy Officer (CPO)
- 614       • Use risk assessment results and existing strategies to inform the alignment between  
615       program development, learning materials, and risk management
  - 616           ○ Gap analysis: Note that existing CPLPs may benefit from a gap analysis or  
617           current program assessment to clearly distinguish between the current and target  
618           states and enable the program leadership to shape their approach accordingly.
- 619       • Identify how the program will meet regulatory and compliance requirements to minimize  
620       risks by educating personnel on their roles in the cybersecurity and privacy culture of the  
621       organization
- 622       • Plan for and support the needs of a diverse workforce, including those with accessibility  
623       requirements and those who work remotely or travel frequently
- 624       • Include learning methods that are experiential and atomize content (i.e., take existing  
625       content and look at how it can be separated into smaller items or repurposed)

## 626    **2.2. Develop CPLP Policies and Procedures**

627    The CPLP policies and procedures work together to express what the organization wants to do  
628    and how to do it. Policies are clear and simple statements, rules, or assertions that specify the  
629    correct or expected behavior of an entity. Policies provide the guiding principles for meeting the  
630    mission and conducting operations and they can help with risk-based decision-making. Policies

631 are written in broad terms and include who, what, when, and why. Procedures describe how the  
632 policy will be implemented or enacted. Procedures are written to include who will do what, the  
633 steps or phases for the action, defined criteria or implementation levels, and related  
634 documentation.

635 For both cybersecurity and privacy business operations, policies and procedures identify  
636 acceptable practices and expectations, as well as guidance for how to train personnel on those  
637 requirements and expectations. It is important for the organization to have CPLP policies and  
638 procedures that align with the broader policies and clearly describe the expectations for the  
639 learning programs.

640 The benefits of establishing policies and procedures include:

- 641 • Defining clear expectations for the workplace
- 642 • Providing executive buy-in of the program
- 643 • Providing a documented management and oversight capability that can be audited
- 644 • Supporting cybersecurity and privacy assurance strategic goals and objectives
- 645 • Clearly identifying information and resources
- 646 • Enabling the training of personnel on their information security and privacy  
647 responsibilities

648

#### 649 **Examples of Learning Program Policy Statements:**

650 The following policy statements are not a prescriptive list of what should be included in  
651 Learning Program policies. These are examples to provide context on what is important when  
652 establishing, reviewing, or updating cybersecurity and privacy learning program policies. Thus,  
653 the statements can include, but are not limited to:

- 654 • The CIO and CISO establish a cybersecurity training program for users of [organization]  
655 information systems.
- 656 • The CPO establishes a privacy training program for users of [organization] information  
657 systems that process personally identifiable information (PII).
- 658 • All personnel, contractors, or others who work on behalf of [organization] accessing  
659 [organization] systems receive initial training and annual refresher training in  
660 cybersecurity and privacy awareness and accepted cybersecurity and privacy practices.
- 661 • Personnel complete cybersecurity and privacy awareness training within 24 hours of  
662 being granted a user account. If a user fails to meet this training requirement, user access  
663 is not granted or will be suspended.
- 664 • All personnel, contractors, or others who work on behalf of [organization] with  
665 significant security responsibilities receive specialized training prior to obtaining access  
666 to the systems that process sensitive information and will be required to complete  
667 refresher training each fiscal year.

- 668 • All personnel, contractors, or others who work on behalf of [organization] with  
669 responsibilities for processing PII receive specialized training prior to obtaining access to  
670 the systems that contain PII and will be required to complete refresher training each fiscal  
671 year.
  - 672 • User accounts and access privileges, including access to email, are disabled for  
673 employees who have not completed annual refresher training unless a waiver is granted  
674 by the CISO or information systems security manager (ISSM).
  - 675 • Privacy managers, the CISO, and ISSMs prepare and submit annual awareness and role-  
676 based training plans.
  - 677 • Privacy managers, the CISO, and ISSMs prepare and submit cybersecurity awareness  
678 reports with content, frequency, format, and distribution at the request of the CPO and  
679 CIO.
  - 680 • The CISO reviews information security awareness and role-based training programs  
681 annually.
- 682 Policies and procedures for cybersecurity and privacy awareness and training (learning)  
683 programs can be found in NIST SP 800-53 control AT-1 [8].

### 684 **2.3. Aligning Strategies, Goals, Objectives, and Tactics**

685 Organizations can utilize a variety of techniques for identifying and describing the steps needed  
686 to implement a program. One method is to begin by identifying the organization’s goals, the  
687 objectives to meet those goals, and the operational tactics to meet those objectives. Each goal  
688 should have objectives that will often include measurable targets, such as identifying who needs  
689 role-based training or training a percentage of the organization by a specified date. Each program  
690 objective will have tactics associated with them. Tactics are tools, methods, or mechanisms that  
691 enable the program to pursue the objective identified in the plan’s strategy. Ultimately, every  
692 individual item in the plan – down to the most detailed tactical level – can be traced back to  
693 where it originates in the overall strategy. It is important that every activity support the overall  
694 CPLP strategy. Managing the steps to implement CPLPs and ensure that the program meets  
695 organizational learning needs requires discipline on the part of the team.

696 **Table 1** outlines a model for the strategy that includes goals, objectives, and tactics.

697 **Table 1.** Elements of a CPLP strategy

Step	Description
<b>Strategy Plan</b>	Learning Program Managers meet to set or reset priorities and develop the CPLP Strategic Plan.
<b>Strategic Goals</b>	Define distinct elements of the Strategic Plan around which to organize the program. Examples of these include goals such as decreasing susceptibility to social engineering attacks, identifying when to apply privacy risk management measures, increasing the adoption of multi-factor authentication, or including scenario-based training activities.

Step	Description
<b>Objectives</b>	Based on the strategic goals, develop objectives that include distinct measurable outcomes and the types of metrics associated with the program element.
<b>Tactic</b>	Based on the objectives, develop tactics (i.e., the mechanism that the CPLPs will use to achieve a program objective in part or in full). Examples include a phishing exercise to promote awareness of social engineering attacks, enterprise-wide newsletters or other announcement mediums, webinars on multi-factor authentication basics and procedures, or brainstorming sessions with subject matter experts on scenario development.

698

699 The following two example scenarios demonstrate each of the implementation steps.

700 **Scenario 1: Protecting Sensitive Printed PII**

701 A physical security review of an area in the organization where sensitive personally identifiable  
702 information (PII) is routinely handled by many employees finds that basic steps are not being  
703 taken to maintain a “clean desk.” Privacy policy requires files that contain sensitive PII to be  
704 kept in folders in locked cabinets. During the review, printed files containing sensitive PII were  
705 located in paper stacks and in folders loosely placed on the top of the desks.

706 The organizational strategy is to improve the handling of printed sensitive PII and ensure that  
707 personnel follow the protection requirements. The Learning Program Manager determines that a  
708 fresh, eye-catching awareness product may encourage better employee adherence to policy and  
709 reduce this risk.

710 An executive offers available funding dedicated to producing printed materials. The Learning  
711 Program Manager may be able to utilize that funding to print “Keep It Clean” stickers to attach  
712 to work folders and provide a case of such folders to each member of the workforce in the area  
713 that handles sensitive PII materials.

714 In this example, the privacy Learning Program Manager participated in the continual monitoring  
715 of the workplace and risks, coordinated the budget, planned the printing of the stickers, and  
716 worked with management to deliver the materials. Because this is a one-time issue, the planning  
717 steps were streamlined under the existing program.

718 **Strategy** – Meet privacy compliance requirements

719 **Strategic Goal** – Support the organization’s Privacy Program

720 **Objective** – Ensure that all employees who handle sensitive PII are trained and aware of  
721 privacy responsibilities

722 **Tactic** – Provide “Keep It Clean” stickers on folders to each employee in areas of the  
723 organization where sensitive PII is processed

724

725 **Scenario 2: Developing new regulatory-required training program**

726 A new regulation requires all cybersecurity professionals to implement a specific procedure in  
727 their daily routines.

728 The cybersecurity Learning Program Manager works with the cybersecurity policy owners to  
729 understand and interpret the guidance. Once completed, they define a strategy with goals and  
730 objectives and identify a set of program tactics that would deliver new training to all members of  
731 the workforce and meet the new requirements with specific new procedures. The cybersecurity  
732 Learning Program Manager decides to work with organizational training staff to create an online  
733 experience, which would also enable remote workers to participate fully.

734 As the course is being completed, the cybersecurity Learning Program Manager works with  
735 organizational leaders and management to identify expected measures of completion and success  
736 and to ensure that all necessary members of the workforce are identified and trained. As an  
737 element of continuous monitoring, the cybersecurity Learning Program Manager works with the  
738 learning office and leadership to test the completion and success of the training.

739 *Strategy* – Meet new regulatory requirements

740 *Strategic Goal* – Train cybersecurity professionals

741 *Strategic Goal* – Build and deliver online training program

742 *Objective* – Launch new online training program that will enable all employees to meet  
743 the new procedure training objectives, even from remote work locations

744 *Tactic* – Work with management to schedule the training and ensure 100 % compliance  
745 in training

746 *Tactic* – Enable a continuous monitoring program to test completion rates and provide  
747 daily tracking to managers

## 748 **2.4. Determining CPLP Measurements and Metrics**

749 Program measurements and metrics are essential to show the effectiveness and impact of the  
750 program, understand where changes are required for success, and meet continued budgetary and  
751 resource requirements. There may be regulations that apply.

752 Metrics should determine what should be measured and why. While laws, regulations, and  
753 policies often set specific measurable requirements, CPLP metrics should go beyond simply  
754 achieving compliance and serve to help measure the CPLP’s impact on workforce attitude and  
755 behavioral changes. The metrics should be tied directly to the goals of the program. The  
756 Learning Program Managers should identify how the metrics will be collected, how frequently,  
757 who should have access to them or receive reports that include information about them, and how  
758 they will be shared.

759 Policies and regulations need to be considered, since they often set specific guidelines on what  
760 information to gather. CPLPs should be prepared to answer some common questions, such as:

- 761 • What policies apply to our organization?
- 762 • How often is reporting required?
- 763 • What data is required in the report?
- 764 • What data are we required to maintain for potential audits?

765 Learning Program Managers should build programs with efficient data gathering techniques to  
766 provide effective reporting information. This will likely include collecting PII on employees that  
767 may carry a heightened sensitivity due to context (e.g., training records are often part of  
768 employment or contract records and can be tied to performance evaluations or result in  
769 consequences for failing to take required training). Learning Program Managers must identify  
770 and manage the cybersecurity and privacy risks associated with processing learning data,  
771 including risks associated with learning management systems and reporting practices.

772 Developing a CPLP metrics plan can be one of the most important yet most challenging parts of  
773 the CPLP effort. An effective set of measurements can help the program get support from the  
774 organization, increase funding, reveal impact on the cybersecurity risk management program,  
775 and demonstrate returns on investment. In recent research efforts by NIST, participants reported  
776 [10] that despite best intentions, their organizations often used a limited number of metrics that  
777 did not provide a complete view of program effectiveness. NIST SP 800-55 *Performance*  
778 *Measurement Guide for Information Security* provides guidance on the selection, development,  
779 and aggregation of information security measures and developing an information security  
780 measurement program.<sup>9</sup>

#### 781 **Examples of Quantitative Learning Program Data:**

- 782 • Cybersecurity incident data, limited to employee-generated incidents or topics that  
783 can be mitigated or addressed in the learning programs
- 784 • Metrics on incident reporting, demonstrating employee ability to recognize and report  
785 potential cybersecurity events
- 786 • Phishing or other simulated attack responses
- 787 • Longitudinal data that depicts program impact over time
- 788 • Employee testing data before the learning program, immediately after the learning  
789 program, and three months after attending the course to assess knowledge retention
- 790 • Performance data by department, including technical performance measures
- 791 • Training attendance, performance assessments, and completion rates
- 792 • Closed-ended (quantitative) employee survey feedback
- 793 • Cost of development and delivery invested per participant
- 794 • Frequency of updating the training material may be used to evaluate relevancy
- 795 • Extent of cybersecurity or privacy events, such as reduced downtime or outages due  
796 to events (these may be indicators for role-based training)
- 797 • Ability to recognize and report privacy information disclosures or misuse
- 798 • Changes following technical training may also provide measurements, such as  
799 reduction of accounts with privileged access, identification of high value assets, new  
800 network segmentation, or additional controls written in acquisition and budget  
801 documentation

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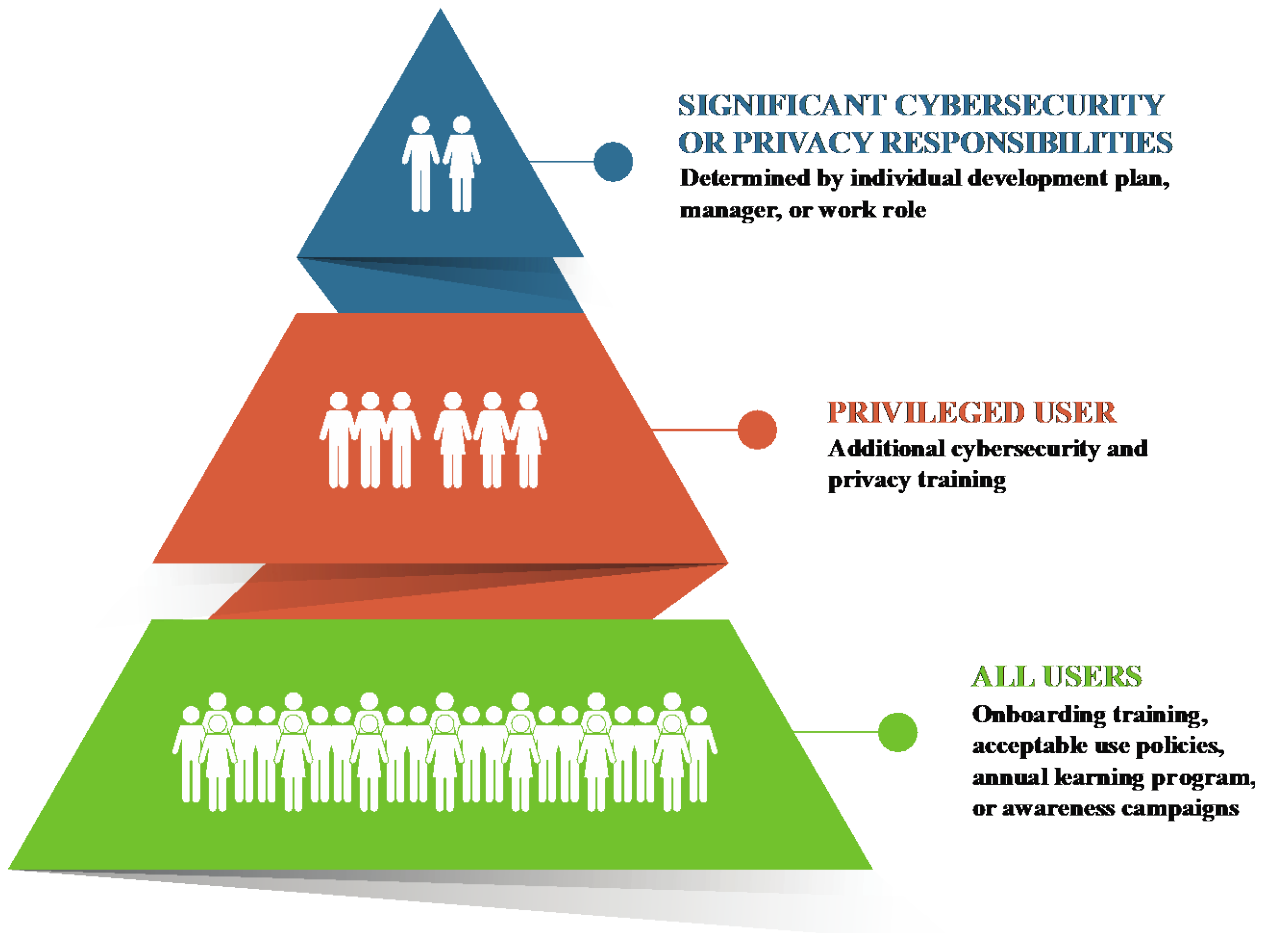
<sup>9</sup> NIST SP 800-55 is currently in development; NIST plans to issue a draft for public comment by Q1 FY2024.

802

803 **Examples of Qualitative Learning Program Data:**

- 804
- Presenter and program feedback
- 805
- Open-ended survey fields
- 806
- Detailed reports from participants
- 807
- Focus groups
- 808
- Observations of learning program participants
- 809
- Suggestion box submissions

810 **2.5. Learning Program Participants**



811

812

**Fig. 4.** CPLP Learning Program participants

### 813 **2.5.1. All Users**

814 In a typical scenario, all of the organization’s personnel (i.e., the general workforce, including  
815 contractors) will participate in the CPLP, agree to abide by the Acceptable Use Policy or  
816 Standards of Behavior, complete the annual Learning Program training, and attend, complete,  
817 view, and receive the other various ongoing program elements.

818 In NIST SP 800-53 [8], All User training is referred to in the Awareness and Training control  
819 (AT-2) as cybersecurity and privacy “literacy” training. As part of or after completing the annual  
820 training, users will sign a Rules of Behavior that defines the behaviors required to gain and keep  
821 system access. NIST SP 800-53 additionally indicates that the training will also need to be  
822 updated for any system changes or following any organization-defined events:

823 “Subsequent literacy training may be satisfied by one or more short ad hoc sessions and include topical information  
824 on recent attack schemes, changes to organizational security and privacy policies, revised security and privacy  
825 expectations, or a subset of topics from the initial training. Updating literacy training and awareness content on a  
826 regular basis helps to ensure that the content remains relevant. Events that may precipitate an update to literacy  
827 training and awareness content include, but are not limited to, assessment or audit findings, security incidents or  
828 breaches, or changes in applicable laws, executive orders, directives, regulations, policies, standards, and  
829 guidelines.”

830 All users in the workforce (previously referred to as “system users” and “general users”) are  
831 critical to reducing unintentional errors and vulnerabilities. The organization’s personnel may  
832 include employees, contractors, foreign or domestic guest researchers, visitors, guests, other  
833 agency personnel, and other collaborators or associates who require access. All users must:

- 834 • Understand and comply with the organization’s cybersecurity, physical security, and  
835 privacy policies and procedures
- 836 • Understand and accept the rules of behavior for the systems and applications to which  
837 they have access
- 838 • Work with management to meet training needs
- 839 • Be aware of actions they can take to better protect their organization’s information and  
840 environment

841 Examples of topics that the CPLP may address include understanding how cybersecurity and  
842 privacy activities support the organization’s mission and business objectives; using proper  
843 passwords; backing up data; using proper antivirus protection; reporting any suspected incidents  
844 or violations of cybersecurity and privacy policies; following the rules established to avoid social  
845 engineering attacks (e.g., ransomware and phishing) and to deter the spread of spam, viruses, and  
846 worms; identifying and addressing privacy risks during information processing; and knowing  
847 where to find the organization’s cybersecurity and privacy resources and points of contact.

### 848 **2.5.2. Privileged Users**

849 Privileged users are trusted with additional access or responsibilities to perform cybersecurity-  
850 and privacy-related functions that ordinary users are not authorized to perform. Due to the  
851 specialized functions that privileged users typically perform and their ability to access critical  
852 resources of the organization, privileged users require additional training to ensure that they  
853 understand their account privileges and do not accidentally cause or exploit vulnerabilities.

854 Examples of such responsibilities include configuring network management and granting system  
855 access (e.g., system administration privileges). For each type of privileged user, the Learning  
856 Program Manager must coordinate training with their manager or supervisor, human capital  
857 officer, and the training managers to ensure that training is delivered and kept current.

### 858 **2.5.3. Staff with Significant Cybersecurity or Privacy Responsibilities**

859 Personnel with significant cybersecurity or privacy responsibilities and some of the privileged  
860 users will be required to have training due to the nature of their role within the organization.  
861 There are circumstances in which personnel have rights or access to sensitive or critical systems  
862 and, therefore, will require additional training. The permitted personnel will have additional  
863 access that can be rescinded when their work role changes. Examples of such environments  
864 include acquisitions, financial management, healthcare, human resources, and web publishing.  
865 NIST SP 800-53, the Role-Based Training control (AT-3) provides a definition for the training  
866 required:

867 Comprehensive role-based training addresses management, operational,  
868 and technical roles and responsibilities covering physical, personnel, and  
869 technical controls. Role-based training also includes policies, procedures,  
870 tools, methods, and artifacts for the security and privacy roles defined.  
871 Organizations provide the training necessary for individuals to fulfill  
872 their responsibilities related to operations and supply chain risk  
873 management within the context of organizational security and privacy  
874 programs. Role-based training also applies to contractors who provide  
875 services to federal agencies.

876 This training is typically associated with job duties determined by organizational leaders, such as  
877 the agency's CIO, CPO, or CISO and the employee's manager or supervisor, and is typically  
878 documented in the employee's performance plan. Personnel in these work roles may require  
879 professional development to maintain their professional status or memberships, such as annual or  
880 regular professional certifications or courses. Examples of typical role-based training recipients  
881 include the CISO, privacy officers, cybersecurity managers, cybersecurity and privacy analysts,  
882 and incident responders. References for cybersecurity work roles or competency areas are  
883 explored in NIST SP 800-181r1 [3], which describes the knowledge, skills, and tasks associated  
884 with cybersecurity-related work.

### 885 **2.5.4. Determining Who Has Significant Cybersecurity and Privacy** 886 **Responsibilities**

887 FISMA [9] requires personnel with significant cybersecurity and privacy responsibilities to  
888 receive role-based training. Additional guidance can be found in NIST SP 800-37 [7], NIST SP  
889 800-53 [8], and NIST SP 800-181r1 [3]. In combination, these documents assist with the  
890 identification of roles and functions in the cybersecurity workforce that require role-based  
891 training. As this document covers the concepts of managing a Learning Program for privacy as  
892 well, consider how to extend the same concepts to help privacy professionals meet their own  
893 role-based or significant privacy training needs.

894 Determining who in the organization will participate in role-based training is a multi-step  
895 process that begins with defining the significant cybersecurity and privacy work roles in the  
896 organization and identifying the staff who are aligned with the designated work role. Often, the  
897 determination begins with senior leadership with direction from the office of the CIO, CISO, or  
898 CPO and in partnership with the Human Resources department. The Learning Program Manager  
899 should participate closely in this effort to identify those on their team who have significant  
900 cybersecurity and privacy responsibilities and need additional training.

901 The work roles should also be included in position descriptions, hierarchy charts, and  
902 responsibilities to show how the work required to achieve a particular objective has been  
903 identified. Individuals may assume additional work roles based on their particular skills,  
904 organization policies regarding cross-training, and organizational staffing levels. NIST SP 800-  
905 181r1 [3] identifies work roles for cybersecurity and is a detailed lexicon for understanding the  
906 related knowledge and skills typical for such roles.

## 907 **2.6. Determining Scope and Complexity**

908 When building any CPLP, the ultimate goal is to reduce risks to the organization, not simply  
909 achieve compliance. The material should be appropriate in scope and complexity for the  
910 participant, so it is necessary for the Learning Program Managers to consider the different types  
911 of workforce participants who will participate in the program. The program material should also  
912 contain the right level of complexity and technical knowledge for the audience's learning  
913 objectives and fulfill their training and awareness needs. This requires coordination with Human  
914 Resources and the Chief Learning Officers (CLO), or equivalent, in the organization to recognize  
915 the roles and responsibilities of individuals in the organization.

916 Individuals who receive the training will appreciate the effort made to ensure that they  
917 understand the material in a manner appropriate to their learning needs and the nature of the  
918 work that they do. The complexity of the material must be determined before development  
919 begins and commensurate with the role of the person who will undergo the learning effort.  
920 Material should be developed based on two important criteria: 1) the target attendee's role, and  
921 2) the cybersecurity and privacy responsibilities required for that role.

## 922 **2.7. The CPLP Elements**

923 A typical CPLP includes a variety of learning program elements that are delivered to diverse  
924 audiences through a variety of platforms and methods. The Learning Program Manager will  
925 work to identify the necessary and most effective types of program elements for each audience  
926 type, per learning goal, and adjust their selections to match their available budget and schedule  
927 considerations.

928 The typical CPLP elements are:

- 929 • Awareness Activities
- 930 • Practical Exercises
- 931 • Training

932 When the average person thinks of a CPLP, they likely think of the annual training event  
933 delivered to All Users. These might be informal department programs, an all-hands presentation  
934 delivered in an auditorium, or an online course. Other learning program elements are targeted for  
935 those with significant cybersecurity responsibilities, including privileged account holders. A  
936 CPLP program will consist of the mandatory elements (required by policy and learning  
937 objectives for all CPLP learning participants) and the many other activities implemented  
938 throughout the life cycle to reinforce these messages.

939  
940 The learning goals for these events are to ensure that personnel are aware of their roles and  
941 responsibilities for protecting assets and are able to take appropriate action against a variety of  
942 cybersecurity and privacy risks.

### 943 **2.7.1. Awareness Activities**

944 Cybersecurity and privacy awareness learning activities are implemented throughout the year to  
945 remind users about a wide variety of risks. Awareness activities should be conducted on an  
946 ongoing basis to ensure that employees are aware of their roles within the organization and the  
947 appropriate steps they must take for the protection of information, assets and individuals’  
948 privacy. Activities can be campaign-oriented or ad hoc based on the subject matter, threats, or  
949 vulnerabilities or during seasonal events.

950 Examples of awareness activities that are appropriate for All Users include:

- 951 • Learning program messages on logon screens, organization screen savers, and email  
952 signature blocks
- 953 • Employee newsletters with cybersecurity and privacy articles
- 954 • Posters (physical or digital) with cybersecurity and privacy tips
- 955 • A Cybersecurity Awareness Month or Privacy Week activity fair
- 956 • Cybersecurity and privacy reminders and tips on employee materials (e.g., pens,  
957 notepads, etc.)
- 958 • Periodic or as-needed email messages that provide timely tips, or that are sent in response  
959 to a cybersecurity or privacy event or issue.

960 Consider that each October is designated as “Cybersecurity Awareness Month” and is, therefore,  
961 a popular month for scheduling various learning activities. Each January, there is a “Data Privacy  
962 Awareness Week,” and it is also a popular time to schedule privacy protection learning events.  
963 Leveraging annual themes and available resources can enhance these special events.

### 964 **2.7.2. Practical Exercises**

965 Practical exercises or experiential learning activities are specific learning scenarios that simulate  
966 events and incidents. The practical exercises can include phishing exercises and other social  
967 engineering campaigns, learning games, quizzes on identifying and processing PII, tabletop  
968 exercises, hands-on virtual lab exercises, contingency plan and disaster recovery scenarios, and  
969 attack or defend scenarios conducted in cyber ranges.

970 An organization-wide All-User phishing exercise is a typical type of practical exercise. In a  
971 phishing exercise, a “tricky” email is sent to users to see whether the user can spot a phishing  
972 attempt or if they can be tricked into clicking on a link to a malicious website or opening an  
973 infected attachment. Since phishing emails can target specific roles in the organization, such as  
974 leadership or known administrators, the phishing exercises can also target specific roles.  
975 Phishing exercises offer opportunities to collect metrics and measurements, which are usually  
976 referred to as click-through or reported measurements. These types of measurements indicate  
977 whether the user reported the email as a phishing attempt or whether they clicked on a link or  
978 opened an attachment. Some organizations include “report phishing” capabilities on their email  
979 platform (e.g., a button on the platform’s menu) to encourage best practices. It can be important  
980 to consider the context of the employee’s work when creating or deploying a phishing test.<sup>10</sup>

981 Be sure to include the organization’s legal team in the design review of planned phishing  
982 exercises to avoid negative impacts, such as using legitimate brands or naming federal  
983 organizations in the phishing “bait,” which could result in emails or calls to those entities. In  
984 addition, since employees may not like being tricked, it is important to tell employees that the  
985 organization is conducting phishing exercises on a random basis and that the results will be used  
986 to guide future learning activities. These activities should not be punitive, nor should any  
987 employee be called out for their response. When viewed as learning opportunities, the phishing  
988 exercises can provide important data on vulnerabilities and which employees may need  
989 additional learning support.

990 Other practical exercises may be better suited for those with significant cybersecurity or privacy  
991 responsibilities (e.g., role-based training) or, if well-designed, could apply to any user group.  
992 These exercises might include table-top exercises and contingency plan scenarios. Additional  
993 examples may be found in the 2006 NIST SP 800-84, “*Guide to Test, Training, and Exercise*  
994 *Programs for IT Plans and Capabilities*”[4].

### 995 **2.7.3. Training**

996 Training is a broad term that includes the Learning Program content designed to increase or  
997 improve job-related knowledge and skills. Some of the techniques that an organization can  
998 employ include:

- 999 • **Synchronous training:** Instructors and students participate together, whether in a virtual  
1000 or a physical classroom-based learning environment.
- 1001 • **Asynchronous training:** The learner is able to access material individually and on-  
1002 demand. This is sometimes called “self-paced” because the learner accesses content  
1003 based on their schedule.
- 1004 • **Virtual led:** Instruction occurs in a virtual or simulated environment and is presented or  
1005 facilitated by an instructor in real time.
- 1006 • **Cyber range:** Instruction takes place in a safe web-based practice environment (i.e.,  
1007 sandbox) and delivers hands-on realistic training, scenarios, challenges, and exercises.

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<sup>10</sup> The NIST Phish Scale considers employee context in its method for determining the difficulty of a simulated phishing email.  
<https://www.nist.gov/news-events/news/2020/09/phish-scale-nist-developed-method-helps-it-staff-see-why-users-click>

- 1008 • **Podcasts:** Learning is asynchronous, self-paced, and typically audio based.
- 1009 • **Animations:** Animations can visually represent a process, system, or complex  
1010 cybersecurity or privacy concept.
- 1011 • **Demonstration:** The instructor provides the learner with the step-by-step actions of a  
1012 process or activity. This can be delivered in-person, recorded, or via other methods.
- 1013 • **Scenario-based exercise:** The facilitator leads discussions on topical, situation-driven  
1014 scenarios that may be customized to the organization or to a specific department. These  
1015 are also referred to as “table-top” exercises.
- 1016 • **Self-paced online training:** This asynchronous technique is currently popular for  
1017 distributed environments. Attendees of a web-based session can study independently and  
1018 learn at their own pace. Testing and accountability features can gauge performance. Web-  
1019 based training can include video, audio, and interactive techniques, such as drag-and-drop  
1020 or fill-in-the-blank exam responses.
- 1021 • **Onsite instructor-led training:** This is one of the oldest and most popular techniques for  
1022 delivering training material to an audience. The biggest advantage of the technique is the  
1023 interactive nature of the instruction. It can also include peer presentations and mentoring.

1024 Blending various training delivery techniques can be an effective way to present material and  
1025 hold an audience’s attention. For example, showing videos during an instructor-led session  
1026 allows the audience to focus on a different source of information. The video can also reinforce  
1027 what the instructor has been presenting.

## 1028 **2.8. Establishing the CPLP Plan Priorities**

1029 There are many elements to consider when entering into the planning phase of the CPLP life  
1030 cycle. A leading consideration is to evaluate the organization’s critical risk factors to determine  
1031 the learning priorities. If a phased approach is necessary, such as due to budget constraints or  
1032 resource availability, some factors to consider are:

- 1033 • **Role and organizational impact** – It is very common to address priority in terms of  
1034 organizational role and risk. Broad-based awareness initiatives that address the  
1035 enterprise-wide mandate may receive high priority because the rules of good  
1036 cybersecurity and privacy practices can be delivered to the workforce quickly. It is also  
1037 common to look at *high trust/high impact* positions (see earlier discussions about  
1038 cybersecurity and privacy specialist roles) and ensure that they receive high priority in  
1039 the rollout strategy. These types of positions are typically commensurate with the type of  
1040 access (and to what systems) these users possess or specialized requirements assigned to  
1041 their roles and job duties.. In addition, the protection of high value or critical assets or the  
1042 deployment of privacy-sensitive products or services can also drive priorities.
- 1043 • **State of current compliance** – This involves looking at major gaps in the CPLP (e.g.,  
1044 gap analysis) and targeting deficient areas for attention.
- 1045 • **Availability of materials and resources** – Determine whether appropriate learning  
1046 material and necessary resources are readily available for the program element.  
1047 Repurpose and utilize existing materials in new ways, when possible.

## 1048 **2.9. Developing the CPLP Plan**

1049 The Learning Program plan refers to the working documents that contain elements that support  
1050 the strategy for each activity or campaign. A Learning Program plan, such as what might be  
1051 created to build an awareness campaign or privileged account holder training, is similar to a  
1052 project plan. The purpose of creating Learning Program plans is to guide the delivery of the  
1053 program elements. This document defines the program element with sufficient detail to inform  
1054 key stakeholders and contributors to perform their roles successfully. Many organizations utilize  
1055 standard program plan templates that provide baselines for organizational expectations.

1056 The exact level of detail within the plan will vary, depending on organizational and program  
1057 requirements and resources. As the program matures, the Learning Program Manager should  
1058 conduct recurring reviews (i.e., at least annually) of the plan, along with the stakeholders and  
1059 individuals who will support and manage the program.

## 1060 **2.10. CPLP Resources**

1061 An important element of developing the CPLP Strategy is to determine what currently exists  
1062 within the organization and what resources are dedicated to the existing programs. If the  
1063 Learning Program does not exist or requires significant redesign or updates, refer to the Program  
1064 Strategy process outlined in Section 2.1 to review the most important program elements for  
1065 inclusion. Resources are typically defined as any asset that is required to meet the goals and  
1066 objectives, such as people, materials, equipment, and technology. An important consideration in  
1067 obtaining resources is establishing a CPLP budget.

### 1068 **2.10.1. Establishing a CPLP Budget**

1069 Once the CPLP strategy has been approved by the senior leadership (identified in Section 1.10.2)  
1070 and the priorities have been established, funding requirements must be added to the plan. A  
1071 determination must be made regarding the extent of funding support to be allocated based on the  
1072 strategic goals. Senior leadership should help the Learning Program Manager understand or  
1073 establish their budget. While each program will have different funding needs, some typical costs  
1074 include:

- 1075 • Training personnel, such as program managers, instructional designers, instructors,  
1076 graphic artists, web developers, and programmers
- 1077 • Classroom space and materials, such as whiteboards, markers, erasers, flip charts, note  
1078 pads, pens, pencils, and name cards
- 1079 • Printed program materials, handouts, and certificates or electronic distribution that may  
1080 require web-based platforms
- 1081 • Online (virtual) space to distribute materials, including synchronous activities such as  
1082 webinars and asynchronous activities such as job aids, recorded sessions, and web-based  
1083 content
- 1084 • Learning Management Systems for content delivery, participant registration, and course  
1085 completion records

- 1086 • Licenses (per-seat) for learning platform or content
- 1087 • Awareness materials, such as posters, notepads, and themed items for awareness
- 1088 activities
- 1089 • Professional services for curriculum design and development and the presentation of
- 1090 content, as well as any additional associated costs

1091 There are strategic and cost-benefit decisions that the organization must make to ensure that the  
1092 CPLP is adequately funded. Some materials may be available from other federal agencies,  
1093 partner organizations, or online vendor resources. Some materials may already exist in-house and  
1094 should be inventoried and evaluated to determine whether they are current and meet the existing  
1095 training goals. The implementation timeline will help indicate when additional funding may be  
1096 required to support tools, major curriculum and content deliverables, new staffing requirements,  
1097 and other learning program elements and activities.

1098

The following are example questions that can help guide development of budget requirements:

- What mission and business needs will be influenced or impacted?
- Are there regulations, legislative requirements, or other internal or external requirements that would influence the decision?
- What shared federal or other external resources can be leveraged?
- What internal resources can be leveraged? This can include existing content and delivery mediums.
- Is it more cost-effective to develop the material in-house versus outsourcing?
- Is the learning requirement specific to the organization or the system? This would include information such as specific policies, procedures, or rules of behavior.
- When must the learning material be ready? Are there critical schedules that need to be met? Would outsourcing allow for delivery schedules to be met?
- How many people need to be trained?
- How often will the material need to be updated?
- What delivery mediums will be required, and what are the associated costs?
- Are there in-house resources to do the job?
- Does the organization have the subject-matter expertise to provide content for the training?
- Are resources available to effectively manage and monitor contractor activity during acquisitions?
- Does the course sensitivity preclude the use of a contractor?

1099

1100 The Learning Program Manager must work with senior leadership to advocate for the Program  
1101 against competing priorities and develop a strategy to address any shortfall in funding that may  
1102 impact the organization's ability to meet its learning goals. This may mean adjusting the learning  
1103 strategy to be more in line with the available budget, advocating for additional funding, or  
1104 reallocating current resources. It may also mean that the program plan needs to be phased in over  
1105 some predefined time period as funding becomes available.

## 1106 **2.10.2. CPLP Staff and Locations**

1107 Those who have managed federal CPLPs report that training the workforce requires a  
1108 combination of technical knowledge and professional attributes, such as communication,  
1109 creativity, and interpersonal skills [11]. If the organization does not have the budget for CPLP  
1110 course developers, determine what other agencies or organizations of similar size have done for  
1111 their own needs. Some organizations may have in-house instructional designers, curriculum  
1112 developers, instructors, web developers, communication experts, and graphic designers. Other  
1113 organizations may need to include these professional costs in the budget for a new project.  
1114 Identify qualified contractors to use or external courses that the organization can purchase.

1115 Different information requires different methods of delivery. Some program elements will be  
1116 appropriate to deliver via online learning, while others will necessitate both instructors and  
1117 physical classroom locations. Determining these requirements up front will allow for appropriate  
1118 resource allocation (e.g., rooms to be reserved, computers and projectors secured, etc.). Even  
1119 posters and flyers require space considerations, as they will need to be displayed in a sufficiently  
1120 prominent area to have a learning impact on the personnel.

## 1121 **2.11. Communicating the Strategic Plan and Program Performance**

1122 One of the most important aspects of executing the CPLP Strategic Plan is collaborating with the  
1123 learning team, key stakeholders, senior leadership, and personnel. Involving stakeholders and  
1124 employees during the planning process can lead to greater success as the program begins and as  
1125 each program element is implemented. Determining what to communicate should focus on:

- 1126 • How the CPLP helps meet organizational and learning goals
- 1127 • How the CPLP elements will impact personnel
- 1128 • Engaging with stakeholders to determine concerns or conflicts in advance
- 1129 • Soliciting feedback to identify gaps or missing elements in the plan

1130 Getting early and continual buy-in for the strategic plan is important to keep the momentum for  
1131 the CPLP strong and to inspire engagement and satisfaction with the plan. A solid  
1132 communication strategy will address those needs. Consider whether the organization has a  
1133 centralized communications department or whether communications decisions will be made at  
1134 the business unit level. Then develop a communications plan (or incorporate these elements into  
1135 an existing communications plan) to share information about the new or updated CPLP. Keep it  
1136 simple and tailored to internal stakeholders. The Learning Program Manager may choose to  
1137 create a custom version of the strategic plan that includes different information for different  
1138 audiences.

1139 Some important elements to share include information about what the CPLP is and who manages  
1140 it. Funding issues and gaps may also need to be identified and addressed. For example, agency  
1141 leaders and managers need to know whether the cost to implement the CPLP activities will be  
1142 funded by the CIO, CISO, CLO, or another program budget or whether their budgets will be  
1143 impacted to cover a portion of the expense. In addition, schedules and completion requirements  
1144 must be communicated.

1145 Elements of the CPLP communications should include:

- 1146 • An overview of the CPLP strategy and ownership
- 1147 • Goals, objectives, and assessment processes
- 1148 • A list of key roles and their respective responsibilities, including:
  - 1149 ○ Senior leadership and executives
  - 1150 ○ Managers and supervisors
  - 1151 ○ Human Resources (HR), Office of the Chief Human Capital Officer (OCHCO),
  - 1152 and labor relations
  - 1153 ○ Office of the Chief Financial Officer (CFO) or budget analyst
  - 1154 ○ Chief Learning Officer (CLO) (agency or organization level)
  - 1155 ○ Learning Program Managers and team members
  - 1156 ○ Subject-matter experts
- 1157 • Budget overview
- 1158 • Key deliverables and high-level schedule
- 1159 • Measurements and metrics
- 1160 • Reporting methods and frequency

1161 It is essential for everyone involved in the implementation of the program to understand their  
1162 roles and responsibilities. Most organizations may find it helpful to tailor their messaging based  
1163 on the audience. A few examples of audiences and their roles include:

- 1164 • **Senior leadership and executives** (e.g., CIO, CISO, SAISO, SAOP, and CPO) –  
1165 Communications may include a high-level summary of the CPLP strategic plan,  
1166 including the goals for and phases of the yearlong program. The senior leadership needs a  
1167 good sense of the overall program so that they can support the allocation of budget and  
1168 personnel. Ensure that senior leaders are provided with appropriate messaging so that  
1169 they can avoid harmful language, such as “users are the weakest link.”
- 1170 • **Managers and supervisors** – Communications should emphasize the benefit of building  
1171 a positive cybersecurity and privacy culture and help the manager or supervisor recognize  
1172 their crucial role in supporting that culture. An objective for their buy-in is to encourage  
1173 positive associations with allocating time for employee learning.
- 1174 • **Human Resources, human capital officers, and labor relations officers** – Those  
1175 involved in Human Resources or human capital are responsible for any required  
1176 communications regarding the implementation of CPLP requirements into the onboarding  
1177 and training of union members throughout the year. If appropriate, the labor relations  
1178 officers will also be key stakeholders in assisting with any updates to the plan and  
1179 receiving reports on learning outcomes and other metrics for their union-represented  
1180 personnel. Human capital is also a crucial stakeholder to provide input about personnel  
1181 disciplinary actions and to initiate labor relations and union negotiations with regard to  
1182 the mandatory training or learning activities outlined in the agency process.

- 1183 • **Chief Financial Officer** – The Office of the Chief Financial Officer (or the organization  
1184 or agency equivalent senior financial officer) is responsible for approving the CPLP and  
1185 dispensing funding to the Learning Program Managers and must, therefore, be kept  
1186 informed about program implementation and measurements.
- 1187 • **Chief Learning Officer** – The Chief Learning Officer is responsible for learning in the  
1188 organization and is an important ally for the CPLP. The CLO may provide the learning  
1189 infrastructure, such as the Learning Management System (LMS) or other distribution  
1190 platforms.
- 1191 • **Personnel** – Create a communications strategy that allows for direct email messages to  
1192 personnel, as well as a distributed system to their managers and supervisors. When  
1193 creating communications materials about the CPLP for individual contributors, such as  
1194 email blasts or the materials in the new hire orientation packages, focus efforts on  
1195 enabling the individual contributor to see their part in the overall CPLP. It should include  
1196 a schedule to ensure that users are notified in sufficient time before they are required to  
1197 complete the learning activity.
- 1198
- 1199

### 1200 3. Analysis and Design of the CPLP

1201 To create a highly effective CPLP, the Learning Program Manager will dedicate time and  
1202 resources to analyzing and designing the program. During the analysis phase, they identify their  
1203 organizational and learning needs or gaps. The gaps are reviewed to determine which audiences  
1204 will need training and and their existing levels of knowledge and skill(s). It may be necessary to  
1205 evaluate various workroles for learning gaps so that relevant learning programs can be  
1206 customized and created based on the specific learning needs for the workrole. During the design  
1207 phase, the gaps are translated into learning objectives, which are the focus of the learning  
1208 material. Tying the learning objectives to identified knowledge and skill gaps ensures that the  
1209 end result is relevant and will succeed in closing the identified learning needs.

#### 1210 3.1. Analysis Phase

1211 The analysis phase is the process during which the Learning Program Manager determines the  
1212 organization’s learning and performance needs. In this context, the needs, which are also called  
1213 gaps, are the difference between the current learning goals (or activities) and the desired state. To  
1214 determine their learning needs, organizations may conduct a formal or informal needs  
1215 assessment (also referred to as a needs analysis). The primary benefit of the analysis phase is to  
1216 identify both learning needs for the organization and the learning audience. Additional benefits  
1217 include having information that clearly defines the learning needs, support for resources and the  
1218 prioritization of resources, and the alignment of learning goals to organizational mission goals.

1219 In the beginning of the analysis phase, it may be helpful to identify the primary members of the  
1220 analysis team, including several additional constituent groups. This may include the following:

- 1221 • **Executive management** – These organizational leaders understand the relevant  
1222 regulations, directives, laws, operational changes, or other requirements that form the  
1223 basis for the CPLP. It is important for the leadership to provide input to the  
1224 organizational learning needs since they set the expectations for the program and the  
1225 personnel. A key role for the Learning Manager in driving learning programs is to  
1226 continually advocate for the program. The Learning Manager will make the case for why  
1227 analysis is important and how an effective CPLP is part of effective risk management.  
1228 Additionally, an effective and well-designed CPLP supports the development of an  
1229 organizational culture focused on cybersecurity and privacy protections.
- 1230 • **Cybersecurity and privacy personnel**– These individuals act as subject-matter experts  
1231 and consultants for the organization. They identify and help document the knowledge and  
1232 skills needed to perform work roles.
- 1233 • **System owners and Program Managers** – These individuals will have information and  
1234 responsibilities for the particular system in use by the organization. For example, the  
1235 owner of the financial system will recognize the impact of a goal on the personnel tasked  
1236 with operating that system.
- 1237 • **Learning Program participants** - Representatives from the employee base and from  
1238 different cybersecurity and privacy work roles can lend their voice and input into the  
1239 requirements gathering and analysis process.

### 1240 **3.1.1. The Importance of the Analysis Phase**

1241 There are many reasons why the analysis phase is rushed or skipped entirely. For example,  
1242 organizations may think it will take too much time, personnel may be unavailable, or the  
1243 necessary funding may be lacking. Most often, organizations believe they already know what  
1244 they need. However, critical problems can arise by skipping the analysis phase, such as:

- 1245 • Wasted spending when learning materials are developed that do not meet the required  
1246 knowledge or skill gaps
- 1247 • Misunderstanding the knowledge and skills gaps of the employee participants, which may  
1248 require personnel, technology, or other resources to remedy
- 1249 • Using training to solve an issue that is not a knowledge or skill gap. For example, an  
1250 employee is unable to perform “additional as assigned” duties. Conducting an analysis  
1251 will help to determine if it is a systematic or structural gap instead of a learning gap.
- 1252 • Providing the right personnel with the wrong information, such as giving privileged users  
1253 only basic training rather than information specific to their additional rights
- 1254 • Providing the wrong personnel with the right information, such as giving privileged user  
1255 training to general users
- 1256 • Providing the right information through an ineffective medium or providing the wrong  
1257 information through a flashy medium
- 1258 • Repeating the same learning material even if previous efforts have failed

1259 It may be tempting or even overwhelming to think about setting aside time to analyze the  
1260 organization’s needs. Even if the only option is to conduct an informal discussion and review  
1261 with a few individuals, it is still important to have the conversation and document what is  
1262 needed. The analysis phase establishes a clear vision for the next steps of the Learning Program’s  
1263 development.

### 1264 **3.1.2. The Steps of the Analysis Phase**

1265 While there are many ways that a Learning Program Manager can evaluate the learning needs of  
1266 the organization, the process for identifying Learning Program needs from a strategic point of  
1267 view tends to be a repeatable process, regardless of the specific learning goal or audience. The  
1268 steps are:

- 1269 1. Identify the learning needs
- 1270 2. Determine the learning audience
- 1271 3. Identify the knowledge or skills relevant to the goals per audience
- 1272 4. Assess the audience’s current knowledge or skill level
- 1273 5. Identify knowledge or skill gaps

1274 Using a specific example, such as implementing multi-factor authentication, the Learning  
1275 Program Manager can develop an awareness program for all users in the organization so that  
1276 they understand their roles in the program. All users will be expected to adopt multi-factor

1277 authentication on their devices when accessing the organization’s systems, and they will be  
1278 informed of the cybersecurity or privacy benefits and purpose of the methodology. Those with  
1279 significant cybersecurity and privacy responsibilities will be trained to add this capability to  
1280 authentication systems and assist personnel at the organization’s helpdesk. Senior leadership will  
1281 participate because they are crucial to ensuring that the goal is well-communicated and supported  
1282 throughout the organization.

### 1283 **3.1.2.1. Identify Learning Needs**

1284 The most important step in initiating a new phase in the CPLP is to establish the learning needs.  
1285 For example, the organization may be about to introduce new technology, legislation may have  
1286 been passed that requires personnel to acquire new knowledge or skills, or a new privacy or  
1287 cybersecurity risk may have emerged that requires the organization to introduce a new learning  
1288 module. Identifying and prioritizing learning needs will allow the Learning Program Manager to  
1289 focus their attention on the issues of greatest importance to the organization.

1290 The following techniques can help define the learning needs:

- 1291 • Identify what knowledge or skills are needed in the organization through a learning needs  
1292 assessment
- 1293 • Review existing work or job analysis reports
- 1294 • Identify any regulatory or other requirements for learning programs
- 1295 • Review cybersecurity or privacy risks. All organizations face operational risks. While the  
1296 majority of risk considerations focus on responding to incidents that result in a failure to  
1297 maintain cybersecurity, it is important to include an effective learning plan as a  
1298 mitigation factor for risks
- 1299 • Review lessons learned or after-action reports. After an incident, the Learning Program  
1300 Manager may be engaged in an effort to educate personnel on corrective best practices.  
1301 This is an important opportunity to truly learn from mistakes. New material should be  
1302 developed that not only speaks to the specifics of the incident but may be able to shore up  
1303 weak areas around it, such as identifying and reporting vulnerabilities

### 1304 **3.1.2.2. Determining the CPLP Audiences**

1305 During the analysis phase, the Learning Program Manager will identify and define the audiences  
1306 to be trained on the identified learning goals. By coordinating with the organization’s  
1307 cybersecurity and privacy learning function, supervisors may be helpful in determining whether  
1308 personnel need additional training.

1309 Potential audiences for the CPLP include:

- 1310 • **New employees:** This audience includes contractors, and the focus is usually on the  
1311 important policies and rules of behavior for the systems that they will access. This  
1312 training includes what is typically called “new employee orientation” or “on-boarding”  
1313 and can be joint cybersecurity and privacy training. Some organizations may need to

1314 include a visitor or guest with acceptable use policies if they allow any type of system  
1315 access, including wireless network connections.

1316 • **All users:** This is also known as “general workforce training” and includes annual  
1317 cybersecurity and privacy training for all organization system users. An analysis of this  
1318 audience’s training requirements should include a review of the performance of previous  
1319 program elements and any new organizational requirements.

1320 • **Privileged users:** These are personnel with additional responsibilities who are trusted to  
1321 perform cybersecurity- or privacy-relevant functions that ordinary users are not  
1322 authorized to perform. They will require additional training in order to be provided with  
1323 privileged access. Some information to consider when identifying privileged users  
1324 include:

1325 ○ Determine whether any new systems have been implemented or are planned, and  
1326 identify the rights and privileges associated with privileged account users.

1327 ○ Review the list of participants with system owners to ensure that the list is  
1328 complete and whether new rights and privileges are required.

1329 ○ Determine whether any of these systems have been moved to the cloud and  
1330 require new training.

1331 • **Staff with significant cybersecurity and privacy responsibilities training:** Some  
1332 positions with significant responsibilities require highly technical implementation by staff  
1333 with significantly specialized responsibilities. This provides additional training that is  
1334 designed for a specific job role, task, or responsibility (also known as “role-based”  
1335 training). This type of training includes:

1336 ○ Specialized or customized training on specific products, networks, systems,  
1337 applications, or information

1338 ○ Work role tasks and activities, such as incident response procedures, oversight  
1339 responsibilities, or identity management

1340 ○ Reskilling and upskilling programs

1341 ○ Learning that helps the employee perform their work tasks

1342 The following are examples of how personnel can be assigned to multiple learning  
1343 programs:

1344 ○ Wilson is currently a system administrator, and as an employee of a federal  
1345 agency she attends the annual CPLP training. She is also in the Information  
1346 Technology department, so she and her team receive additional training on  
1347 cybersecurity and privacy. In her role as a system administrator, she has  
1348 significant cybersecurity and privacy responsibilities and is therefore required to  
1349 attend additional training.

1350 ○ Ng is now part of the organization’s web publishing team and has access rights to  
1351 publish the public-facing webpages of the organization. This carries significant  
1352 agency branding and communications responsibilities. Ng must take annual  
1353 training and sign an additional Acceptable Use Policy regarding appropriate  
1354 publishing activities.

### 1355 **3.1.2.3. Identify the Knowledge and Skills Needed per Participant Type**

1356 The primary knowledge and skillset for All Users is the ability to recognize cybersecurity and  
1357 privacy risks, take appropriate actions to reduce harm to the organization, and report any  
1358 incidents or events, when appropriate. All Users must be empowered and skilled in adhering to  
1359 the organization’s Rules of Behavior and Acceptable Use Policies, which include guidance on  
1360 how to use organization-provided devices and access network resources.

1361 Privileged users must possess the knowledge and skills to appropriately use systems that they  
1362 have been given access to without introducing additional risks or harm to the organization. The  
1363 training they receive must provide them with the ability to judge risks appropriately.

1364 It is critical to identify the necessary role-based knowledge and skills for those with significant  
1365 cybersecurity or privacy responsibilities. The NICE Framework can be a useful resource for  
1366 identifying the knowledge and skills related to specific cybersecurity learning objectives if the  
1367 learning goal is clear. The NICE Framework includes detailed knowledge and skills statements at  
1368 a high level related to the work that personnel perform in a variety of cybersecurity work roles.  
1369 In addition, an organizational job analysis will be useful in determining what the learning  
1370 objectives are for the program participants. For those with significant privacy responsibilities, the  
1371 Learning Program Manager should consult with the privacy senior leadership of the organization  
1372 (i.e., CPO or SAOP) for additional guidance on knowledge and skills required per individual.  
1373 The Learning Program Manager may also need to consult with managers and subject-matter  
1374 experts related to the learning goal for additional input on needed knowledge or skills<sup>11</sup>.

1375 There are existing models for evaluating the tasks necessary for a particular person’s role, such  
1376 as considering the complexity or difficulty of the task, its importance, and how frequently the  
1377 task is performed. This is sometimes referred to as the “DIF model” for considering the relative  
1378 difficulty, importance, and frequency of the task. It can be helpful for identifying the knowledge  
1379 and skills that the CPLP should focus on when training those with significant cybersecurity or  
1380 privacy responsibilities.

### 1381 **3.1.2.4. Assess Each Audience’s Current Knowledge and Skill Level**

1382 After determining the knowledge and skills needed, the next step in the analysis phase is to  
1383 determine what the audience segment already knows about the topic and skills they possess  
1384 while keeping the learning goal in mind. The CPLP should focus on providing the learner with  
1385 the requisite amount of new knowledge and skills while reinforcing existing knowledge and  
1386 skills.

1387 There are several methods for determining the existing knowledge and skill set:

- 1388 • Hold guided conversations and interviews with subject-matter experts, managers, system  
1389 owners, and other organization personnel with relevant mission or business functions.
- 1390 • Review recent job task analyses.
- 1391 • Analyze events and related responses that may indicate skill levels.

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<sup>11</sup> One such resource is the NIST Privacy Workforce Public Working Group which is working to identify and document Tasks, Knowledge, and Skills aligned with the NIST Privacy Framework. <https://www.nist.gov/privacy-framework/workforce-advancement/privacy-workforce-public-working-group>

- 1392 • Conduct performance-based assessments to evaluate and validate capabilities
- 1393 These methods can also identify whether new training is needed for a role or roles or whether
- 1394 existing training needs to be updated or modified.

### 1395 **3.1.2.5. Identify Knowledge and Skill Gaps**

1396 The result of the analysis thus far is a measure of the personnel’s existing knowledge and skills  
1397 with an overview of each audience segment. The difference between that and the ideal state of  
1398 knowledge for the learning goal is referred to as “the learning gap.” During the design phase, the  
1399 Learning Manager will use information about each learning gap (per learning goal, learning  
1400 audience, etc.) to design a program specific enough to address each need.

## 1401 **3.2. Designing the CPLP**

1402 At the beginning of the design phase, consider what knowledge and skills the audience needs to  
1403 learn or develop and what gaps the learning material will close. This will drive the creation of the  
1404 learning objectives and the process for achieving them. The design process should end with a  
1405 systematic blueprint of the approach needed for the CPLP to address the identified knowledge  
1406 and skills gaps of the personnel.

### 1407 **3.2.1. The Steps of the Design Phase**

1408 The Learning Program Manager begins a formal design phase for the CPLP or a new element in  
1409 the ongoing CPLP by creating a Design Document that outlines the requirements. They will then  
1410 determine whether they need to build or buy learning materials to satisfy those requirements. The  
1411 Learning Program Manager moves into a highly detailed design phase that will lead to the  
1412 development of revised or new program assets. The steps in design phase are:

- 1413 1. Create a Design Document.
- 1414 2. Conduct an environmental scan of available training, both internal and external.
- 1415 3. Identify learning objectives.
- 1416 4. Summarize learning requirements.

### 1417 **3.2.2. Design Document**

1418 The Design Document provides a blueprint for the development and implementation of the  
1419 learning program elements. The Design Document is usually created by the Learning Program  
1420 Manager and reviewed by key stakeholders (when necessary for funding and other approvals)  
1421 before moving to the development phase.

1422 Typical elements of a Design Document include:

- 1423 • Purpose, goals, and background
- 1424 • Intended audience
- 1425 • Learning objectives

- 1426 • Content and environmental scan (e.g., build or buy)
- 1427 • A course outline, including high-level topics (e.g., number of lessons or modules and  
1428 their length)
- 1429 • An instructional strategy that includes media (e.g., audio, video, demonstrations,  
1430 emulations, simulations), activities, and exercises
- 1431 • Delivery medium (i.e., the learning environment – online, classroom, etc.)
- 1432 • Types of assessments (e.g., participation, quiz with passing grade, performance-based  
1433 skill assessment, etc.)
- 1434 • Required measurements and metrics
- 1435 • Signature page to document acceptance from the key stakeholders

1436 Based on its resources, the organization will determine whether it can build, have built, or utilize  
1437 existing government or commercial off-the-shelf learning content, which is discussed further in  
1438 Section 4.

### 1439 **3.3. Conduct an Environmental Scan of Available Training**

1440 The Learning Program Manager will need to determine what training materials have previously  
1441 been used in their organization and are still available and appropriate for use. Additionally, there  
1442 may be materials and programs available from elsewhere in the organization, agency, or partner  
1443 agencies. Federal resources may have materials, presentations, and even speakers available to  
1444 satisfy a variety of learning goals. An important result of the environmental scan effort will be  
1445 insight into what is currently being done to meet learning requirements in the organization and  
1446 the gap in needed program material.

#### 1447 **3.3.1. External Sources of CPLP Material**

1448 There are a variety of external sources of cybersecurity and privacy learning program material  
1449 that can be incorporated into a CPLP. Some possible sources include:

- 1450 • **Vendors:** If the organization decides to outsource some or all of its CPLP course  
1451 development, a number of vendors in the private sector offer “off-the-shelf” courses that  
1452 are suitable for particular audiences or that can be developed for specific audiences. Prior  
1453 to selecting a particular vendor, agencies should have a thorough understanding of their  
1454 CPLP needs and be able to determine whether a prospective vendor’s material meets  
1455 them. Also, consider who “owns” the material for the purposes of future updates and  
1456 adaptations. Be sure to check with the agency contracting officer to ensure that  
1457 organizational guidelines are met.
- 1458 • **Non-profit organizations and grant-based agreements:** Federal organizations may  
1459 have agreements with non-profit organizations, grants to universities, or other similar  
1460 arrangements for the creation of educational materials on cybersecurity or privacy topics.  
1461 Learning Program Managers should be aware of any such opportunities to leverage these  
1462 materials.

1463 • **Other organizations:** Organizations can explore the use of CPLP material that has been  
1464 developed by other organizations and edited to fit their needs rather than developing a  
1465 completely new course. Care should be taken that the available material is applicable to  
1466 the intended audience and that the material addresses the learning goals of the  
1467 organization.

1468 • **Shared events and material:** Several federal agencies offer cybersecurity and privacy  
1469 learning events that are open to personnel across the government. Learning Program  
1470 Managers should join federal working groups to remain informed about events,  
1471 workshops, and conferences intended for professional development.

1472 Sources of timely material may include:

1473 • Email advisories issued by industry-hosted news groups, academic institutions, or the  
1474 organization’s cybersecurity or privacy office

1475 • Cybersecurity or privacy websites

1476 • Themed events, such as Data Privacy Week, Cybersecurity Awareness Month, or  
1477 Cybersecurity Career Week

1478 • Conferences, seminars, webinars, forums, and courses

### 1479 **3.3.2. Internal Sources of CPLP Material**

1480 Within an agency or organization, cybersecurity and privacy Learning Program Managers can  
1481 build new partnerships or reinforce existing ones with the organization’s functional managers  
1482 who coordinate or conduct their own CPLPs. Functional training developed in-house (e.g.,  
1483 financial applications or personnel management) often lacks adequate discussion of related  
1484 cybersecurity and privacy issues. Through these cross-departmental partnerships, Learning  
1485 Program Managers can review existing references to their topic areas in the material and check  
1486 for completeness and accuracy. The Learning Program Manager can also assist the functional  
1487 manager by developing a learning module for any material that previously had no cybersecurity  
1488 or privacy component.

## 1489 **3.4. Identify Learning Objectives: From Analysis to Design**

1490 The Learning Program Manager consolidates what they have identified from the review of  
1491 available materials in order to identify learning objectives for the CPLP. Whether the Learning  
1492 Program Manager is working on the entire Plan, designing a few new elements, or updating  
1493 existing elements, this stage can be very useful in ensuring that the effort is closely aligned with  
1494 identified organizational needs.

### 1495 **3.4.1. Examples of Identifying Learning Objectives**

1496 Consider these examples of identified training gaps and their associated learning objectives:

1497 **Scenario 1:** A recent analysis indicated that on-site, remote, and teleworking employees –  
1498 including employees with privileged accounts – are using single-factor authentication (i.e., a  
1499 password). The Chief Information Officer has approved the implementation of a multi-factor

1500 authentication token system starting with privileged accounts in the first quarter and all other  
1501 accounts in the second quarter. The CPLP Learning Program Manager has been tasked with  
1502 helping employees understand their roles in utilizing this new multi-factor authentication system.

1503 **Analysis Phase: Identify Knowledge and Skill Gaps**

1504 Since this is a new authentication method, both All Users and Privileged Users need  
1505 information and training on the new policies, processes, and procedures for accessing the  
1506 system. In addition, they need to know why this is important or how it protects the  
1507 information and assets on enterprise systems. Privileged Users will also need additional  
1508 information focused on the additional privileges they will have once authenticated to the  
1509 system.

1510 **Design Phase: Create Learning Objectives Based on Knowledge and Skill Gaps**

1511 Once the knowledge and skill gaps are identified, the next step is to establish the learning  
1512 goals and objectives for the program. In this example, the goals and objectives for the  
1513 learning program involve enabling employees to:

- 1514 • Understand the vulnerabilities associated with using single-factor authentication  
1515 (e.g., user ID and password)
- 1516 • Understand why the organization is using a multi-factor authentication token  
1517 method
- 1518 • Identify their role in using multi-factor authentication
- 1519 • Install the authentication application and verify that the token is received
- 1520 • Utilize the token 100 % of the time for authentication to the system

1521 **Scenario 2:** A recent external audit of the organization’s system privacy policies and practices  
1522 highlighted several concerns. The top issues were that (1) the public privacy notice indicated that  
1523 PII was only being shared with certain entities, when in fact it was being shared with other  
1524 entities as well; (2) Information System Privacy Officers and Managers (ISPO/ISPMs) had too  
1525 many systems to oversee, monthly data processing reports were not reviewed in a timely manner,  
1526 and management was not receiving reports of critical problematic data actions; and (3) the  
1527 financial office employees were not adequately protecting the privacy of employee bank  
1528 information when processing the employees’ travel costs.

1529 **Analysis Phase: Identify Knowledge and Skill Gaps**

1530 During the analysis phase, the CP Learning Manager determined the following:

- 1531 • Systems owners of systems processing PII are designated as employees with  
1532 significant privacy responsibilities and participate in an annual three-hour  
1533 customized seminar that includes new policies, privacy risk briefings, and  
1534 network opportunities. During the next version of the existing training, additional  
1535 content on verifying how PII is being process comports with the public privacy  
1536 notice will be added.
- 1537 • While the ability to review monthly data processing reports may be a resource  
1538 issue, no training gap is determined at this time. Further analysis would be needed  
1539 to determine whether ISPO/ISPMs were able to identify critical problematic data

1540 actions, whether they possessed the skill, or whether additional ISPO/ISPMs were  
1541 needed. This issue may require discussion and review with senior leadership to be  
1542 fully resolved.

1543 • Financial office employees are designated as employees with significant  
1544 cybersecurity and privacy responsibilities and receive an annual one-hour self-  
1545 paced training course. Based on the analysis, it was determined that the financial  
1546 office employees lacked a basic understanding of the policies and procedures for  
1547 protecting sensitive and privacy-related information. Since this could have  
1548 immediate and damaging consequences, this lack of knowledge will be addressed  
1549 with a customized training solution and by including the topic in updates to the  
1550 annual one-hour self-paced training course.

### 1551 **Design Phase: Create Learning Objectives Based on Knowledge and Skill Gaps**

1552 The learning goals and objectives for this example are:

- 1553 • The briefing material for the system owners contained two learning objectives:
- 1554 ○ To be able to identify the elements of the privacy notice that relates to the  
1555 PII being processed in their systems
  - 1556 ○ To be able to verify with systems engineers that the PII processing  
1557 comports with the appropriate elements of the privacy notice
- 1558 • No training gap was determined at this time.
- 1559 • A webinar was scheduled with the financial office employees with the following  
1560 learning objectives:
- 1561 ○ To be able to describe what is considered sensitive or personally  
1562 identifiable information
  - 1563 ○ To be able to describe the policies and procedures for protecting sensitive  
1564 and personally identifiable information
  - 1565 ○ To be able to adequately protect information while in use and while it is  
1566 stored on the system when given an online form containing privacy-related  
1567 information

1568 As in the examples, the learning content should be designed based on the user segments, such as  
1569 All Users, Privileged Users, and Users with Significant Cybersecurity or Privacy  
1570 Responsibilities.

### 1571 **3.5. Summarize CPLP or Element Requirements**

1572 Before moving to the development phase, the Learning Program Manager must consolidate their  
1573 requirements for development using the results of the analysis and design phases. They should be  
1574 able to fully articulate the Learning Gaps being targeted (per audience) and the related Learning  
1575 Objectives.

1576 Additional CPLP requirements that are important to consider are:

- 1577 • Material must accommodate all learning styles.

- 1578 • Program elements should meet accessibility standards.
- 1579 • Require the ability to update and maintain content to stay current.
- 1580 • Ensure that the material works for different audience types and sizes.
- 1581 • Recognize and support the diversity of the workforce.
- 1582 • Provide an overview of what class participants can expect to learn after progressing  
1583 through the learning materials.
- 1584 • Establish learning objectives in accordance with the organizational mission.
- 1585 • Dedicate a separate section to each learning objective and create individual lessons for  
1586 each of the learning objectives.
- 1587 • Integrate visual elements, such as graphics, videos, tables, and other visual tools to  
1588 reinforce important concepts.
- 1589 • Use interactions to engage the audience and promote their ability to transfer content from  
1590 the training environment to the workplace.
- 1591 • Enable managers and supervisors to check progress, run reports, and access the LMS.
- 1592 • Support required reporting needs for the executive leadership.
- 1593 • Ensure that the IT and help desk staff receiving training to support the CPLP.
- 1594 • If using outsourced courses, ensure that vendors are supported and can update the  
1595 reporting and LMS platforms.
- 1596
- 1597

## 1598 **4. Development and Implementation of the CPLP**

1599 Once the CPLP requirements have been established and documented in the design phase, the  
1600 Learning Program Managers can proceed to develop the Program. This phase is where each  
1601 audience's requirements are evaluated, budgeted, and provided for separately. Typically, the  
1602 requirement to develop an All User CPLP will be well-understood and may already exist.  
1603 Determine whether that is true, whether the program requires significant investment to be  
1604 updated, and whether the talent and expertise are available to support the needed work.

1605 The development process will involve various personnel, including:

- 1606 • **Management:** All levels of management will be responsible for their staff learning  
1607 needs, the prioritization of training resources, the identification of training gaps, and  
1608 evaluation of the training's effectiveness.
- 1609 • **Cybersecurity and privacy specialists and subject-matter experts:** Specialists and  
1610 subject-matter experts help determine the task, knowledge, and skill requirements of the  
1611 roles or job functions, identify training gaps and needs within the organization, and guide  
1612 the development and review of learning materials.
- 1613 • **Training professionals:** Training professionals acquire, customize, develop, present, and  
1614 evaluate the training content and training programs. Whether the training team and  
1615 cybersecurity and privacy teams are in the same department or not, the groups will work  
1616 closely together, along with other subject-matter experts to ensure the relevance and  
1617 accuracy of the material and programs.
- 1618 • **Acquisitions and budget:** These departments will be engaged when circumstances and  
1619 needs require the development or acquisition of externally sourced services or content.

1620 Once the baseline requirements of the program have been solidified, a feedback strategy can be  
1621 designed and implemented to ensure that materials continue to support the CPLP strategy and  
1622 address identified training needs.

### 1623 **4.1. Developing CPLP Material**

1624 After the Learning Program Manager has completed their analysis and design reviews, they will  
1625 have a comprehensive set of Design Documents to guide the development of new materials.  
1626 These documents are useful when allocating budgets and personnel for the creation of new  
1627 materials or program elements. However, additional information will be needed to guide the  
1628 content creators in their work.

#### 1629 **4.1.1. Create a Requirements Document for Sourcing New Material**

1630 If the Learning Program Manager determines that it is necessary to create or source new CPLP  
1631 content, curricula, or other program elements, they will need to create a Requirements  
1632 Document. The Requirements Document incorporates the information from the Design  
1633 Document as well as any additional and necessary information to provide to the training and  
1634 curricula developers, editors, and designers, whether they are in-house or vendors. The  
1635 Requirements Document will also be useful for the organization's acquisition and budget  
1636 functions.

1637 The Requirements Document provides detailed and specific criteria related to the content needed  
1638 to meet the learning objectives. Typical prompts or questions to review when creating the  
1639 Requirements Document include:

- 1640 • What specific cybersecurity or privacy risks does the organization seek to address or  
1641 reduce?
- 1642 • What knowledge or skills should the learner acquire or improve as a result of the CPLP  
1643 element?
- 1644 • What behaviors need to be addressed or reinforced?
- 1645 • Does the material contribute to a positive cybersecurity and privacy culture that  
1646 reinforces the role of all users in reducing organizational risk?
- 1647 • Will the material engage personnel?
- 1648 • What are the budget requirements and timing?
- 1649 • Who in the organization will be included in reviews of content development and  
1650 approvals?
- 1651 • What sort of user testing will be conducted to ensure content is appropriate for the  
1652 Learning Program participant; meets their needs and is appropriate to their skill level.

#### 1653 **4.1.2. Developing the All User Learning Program**

1654 The All User Learning Program elements, as described in Section 2.5.1, are delivered throughout  
1655 the year. However, there may be necessary updates to and iterations of the content based on  
1656 events and organizational requirements. Ensure that the budget is allocated to update the content  
1657 or amend the materials with other delivery methods (e.g., to video training) if making actual  
1658 content changes would be cost prohibitive.

1659 The challenge of developing a dynamic and effective All User Learning Program – and  
1660 particularly, the cybersecurity and privacy presentation – is that the audience is aware of the  
1661 compulsory nature of the program so the materials and presenters must be engaging and hold  
1662 their attention. There is much at stake given the ever-changing nature of cybersecurity and  
1663 privacy risks to the organization, especially when learners arrive with an expectation that they  
1664 only need to do the bare minimum to fulfill their training requirement. However, there will  
1665 almost always be new and crucial content for them to understand and master in order minimize  
1666 the organization’s risk.

1667 Consider how key messages will be reinforced throughout the All User Learning Program.  
1668 Whether it is part of an annual event or shared on awareness materials, repeated messages  
1669 become retained messages. Use the awareness program materials to keep the All User Learning  
1670 Program topical without becoming repetitive or intrusive. This is a tricky balance to achieve and  
1671 requires a variety of delivery formats and messages. Consider varying the awareness program  
1672 techniques, such as sending out cybersecurity or privacy topic emails on a monthly basis, adding  
1673 a campaign message to everyone’s official organization signature block for Cybersecurity  
1674 Awareness Month in October, or Data Privacy Week in January, or place posters in the agency’s  
1675 lunchroom all year round.

1676 There are many techniques for disseminating cybersecurity and privacy awareness messages  
1677 throughout an organization. Choosing those techniques depends on available resources and the  
1678 complexity of the messages. Some techniques that are appropriate for a single message include  
1679 posters, screensavers, warning banners, organization-wide emails, brown bag seminars, and  
1680 awards programs. Techniques that can more easily include several messages or themes include  
1681 “do and don’t” lists, email newsletters, web-based sessions, teleconferencing sessions, in-person  
1682 instructor-led sessions, and email signature messaging. Examples of awareness material can be  
1683 viewed on the Federal Information Security Educators (FISSEA) website<sup>12</sup> under Contests for  
1684 Awareness and Training.

1685 Additional considerations when developing the All User Learning Program:

- 1686 • What does the organization want all personnel to be aware of regarding cybersecurity and  
1687 privacy? Starting points may include a review of the latest top risks to the organization,  
1688 as reported by the information security or privacy office; common risks reported by  
1689 cybersecurity and privacy organizations; and new mission goals with cybersecurity or  
1690 privacy implications. Evaluating organizational policies, program reviews, internal  
1691 audits, internal controls program reviews, self-assessments, and spot-checks can also help  
1692 Learning Program Managers identify additional topics to address.
- 1693 • Were constraints found in the Analysis? For example, does the organization have  
1694 particular issues with delivering a Learning Program to personnel? Will personnel be able  
1695 to access or attend training by a particular required date to achieve completion? Are some  
1696 personnel working remotely, traveling, located overseas, or require reasonable  
1697 accommodations? Consider what additional steps will be needed to ensure that all  
1698 personnel can participate in the All User Learning Program and fulfill their Learning  
1699 Program obligations.

#### 1700 **4.1.3. Developing a Privileged Users Learning Program**

1701 The steps for this phase are similar to developing the All Users Learning Program. Create a  
1702 Requirements Document that aligns learning goals for this audience with available funding as  
1703 well as organizational requirements.

1704 Additional considerations for Developing the Privileged User Learning Program:

- 1705 • What do we want privileged users to be aware of regarding cybersecurity and privacy?
- 1706 • What procedures do personnel need to follow to adequately protect their privileged  
1707 accounts?

1708 Some starting points include understanding the rights and privileges allotted to this group,  
1709 reviewing the risks related to privileged accounts or the systems or applications associated with  
1710 privileged access, reviewing these issues with the CIO or CISO’s office, and aligning learning  
1711 goals for these risks to the available budget for impacted personnel and departments. Evaluating  
1712 organizational policies, program reviews, internal audits, internal controls program reviews, self-  
1713 assessments, and spot-checks can also help Learning Program Managers identify additional  
1714 topics to address.

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<sup>12</sup> <https://www.nist.gov/itl/applied-cybersecurity/fissea>

1715 **4.1.4. Developing a Learning Program for Those With Significant Cybersecurity**  
1716 **and Privacy Responsibilities**

1717 The more customized and individualized nature of ongoing skills development and training for  
1718 personnel with significant cybersecurity and privacy responsibilities will require a more detailed  
1719 and nuanced Learning Program approach. For example, it may require multiple Requirements  
1720 Documents for developing new Learning Program elements and identifying training that will  
1721 satisfy learning objectives. The Learning Program Manager will partner and coordinate these  
1722 efforts with the organization’s human capital office, Chief Learning Officer, training and  
1723 curriculum developers, and the individual managers and supervisors for the personnel in this  
1724 group.

1725 Various methods for developing or identifying role-based training for these users are available to  
1726 the Learning Program Manager. They should ensure that the complexity of the training is  
1727 commensurate with the role and needs of the people who will undergo the learning effort.  
1728 Cybersecurity and privacy role-based training material can be developed at a beginning level for  
1729 a person who is just learning a discipline. Material can be developed at an intermediate level for  
1730 someone who has more experience and, therefore, more responsibility in their workplace.  
1731 Advanced material can be developed for agency subject-matter experts whose jobs incorporate  
1732 the highest level of trust and an accompanying high level of cybersecurity or privacy  
1733 responsibilities.

1734 **4.1.5 Conducting User Testing on new CPLP Elements**

1735 Include a user testing phase for all new CPLP elements prior to implementation. Content should  
1736 be assessed for each learning program participant group to ensure it meets their needs and is  
1737 appropriate to their skill level. Additional user testing might include evaluating the intended  
1738 element’s delivery method, the appropriateness of the language, the value to the learner, overall  
1739 acceptance of the new element. Feedback from user testing should be iterative and incorporated  
1740 at every step of the design effort, not just in the form of evaluations after implementation.

1741 **4.2. Implementing New CPLP Elements**

1742 Implementation refers to the actual distribution and delivery of the CPLP material. This phase  
1743 focuses on the connection between the learner and the content. Once the plan for implementing  
1744 the CPLP has been communicated to and accepted by management (see Section 2.11), the  
1745 implementation phase can begin. Use a life cycle process when implementing the program to  
1746 avoid a “one and done” scenario and periodically review the program for updates and  
1747 corrections.

1748 **4.2.1. Steps for Implementing a new CPLP Element**

1749 The Learning Program Manager should implement a new Learning Program or a single element  
1750 with the same repeatable steps. It is of the utmost importance that all of those involved in the  
1751 implementation phase be included in a well-designed communications effort. This ensures that  
1752 personnel and their managers or supervisors are well-informed about any upcoming CPLP  
1753 opportunities that are relevant to their required learning plan. The implementation phase is also

1754 the time to confirm that the required reporting and metrics can be satisfied in later program  
1755 phases. Steps to consider before initiating the implementation phase include:

- 1756 1. Communicate the CPLP implementation
- 1757 2. Plan to measure success by establishing measurement, metric, and reporting requirements
- 1758 3. Build a CPLP schedule
- 1759 4. Plan to evaluate program success by reviewing post-implementation  
1760 feedback, measurements, and metrics

### 1761 **4.3. Communicating the CPLP Implementation**

1762 Communication is a large part of developing an organization's shared culture of supporting the  
1763 Learning Program efforts. The Learning Program Manager should develop a Communications  
1764 Plan for each phase of the program element implementation and include the organization's  
1765 communication team. The Learning Program Manager should determine the appropriate timing  
1766 to inform managers, supervisors, and possibly the personnel involved about upcoming and  
1767 required Learning Program elements, as well as the frequency with which to send out reminders  
1768 and other forms of communication that encourage cooperation from the organization.  
1769 Communication is a large part of developing an organization's shared culture of supporting the  
1770 Learning Program efforts.

1771 Each individual CPLP element (e.g., presentation, course, or tabletop exercise) requires a  
1772 separate and more detailed form of communication to inform the learners and their managers of  
1773 the following:

- 1774 • Purpose of the training or learning activity
- 1775 • Participating employee groups (if not all users)
- 1776 • Consequences of not completing the training (by deadline or at all)
- 1777 • Course title
- 1778 • Delivery method (e.g., in person, virtual delivery, self-directed online learning, etc.)
- 1779 • Required or recommended accommodations
- 1780 • Tracking method (and completion tracking)
- 1781 • Availability date
- 1782 • Due date
- 1783 • Verification of users with significant cybersecurity responsibilities
- 1784 • How to request accommodations

1785 The Communications Plan should include a clear explanation of why the training is being  
1786 mandated or encouraged. Applicable federal legislation, regulations, and internal (agency or  
1787 organizational) policies should be referenced.

1788 Each category of user must be specified for the training assigned. For example, if the  
1789 organization's policy states that all IT users must complete a particular training to gain or

1790 maintain access to IT systems, the communications plan must include this notice. For those with  
1791 significant cybersecurity or privacy responsibilities, identify which training is assigned to a  
1792 specific work role, individual, or department.

1793 Employees must know the consequences of failing to complete the learning activity according to  
1794 the organization's policy. This should be explained in the Learning Program Communications  
1795 Plan and noted in the course description in the Learning Plan within the Learning Management  
1796 System.

1797 Other considerations for CPLP communications include:

- 1798 • Course titles and numbers should be unique, differentiated, and include information on  
1799 the access method (e.g., online or in-person), availability, course dates, and deadlines.
- 1800 • All learners, their managers or supervisors, and human capital departments should be  
1801 made aware of any required training and associated due dates. Communication should  
1802 include reminder messages, references and links to the organization's official policy  
1803 statements for employee information systems, and the consequences for failing to  
1804 complete the learning activity.

#### 1805 **4.4. Establishing Reporting and Metrics Requirements for CPLP Elements**

1806 The Learning Program Manager should strive to ensure that the implementation of all new CPLP  
1807 elements (e.g., courses, training, posters, practical exercises, etc.) will allow for performance  
1808 metrics and measurements to be established and collected. Establish these requirements during  
1809 the developmental phases of both the overall program and each component for which measures  
1810 are expected to meet regulatory and annual reporting requirements and to continually assess and  
1811 improve the performance of the program. As previously mentioned in Section 3.2.2, these must  
1812 be included in the Design Plan requirements that go to curriculum and content developers.

1813 In addition to any applicable measures that support the program, as described in Section 2.4, the  
1814 Learning Program Manager should utilize element level measures, such as the target percentage  
1815 of the applicable audience who receives the training or awareness material and feedback from the  
1816 audience on effectiveness of the material.

1817 Some considerations for reporting:

- 1818 • Learning Management System (LMS) integration: Training is usually tracked and  
1819 recorded using the LMS. Will the course or training element include quizzes with scores  
1820 or other metrics and measurements?
- 1821 • Non-LMS integrated elements: Consider how the participation and performance of each  
1822 learner will be tracked and recorded if the training is face-to-face, virtual, or hybrid. Will  
1823 manual or paper tracking be required?

#### 1824 **4.5. Building a CPLP Schedule**

1825 Establish a primary calendar for CPLP activities. The process may be automated using an LMS.  
1826 Enable organization-wide access so that personnel can find elements applicable to each audience  
1827 segment (e.g., by date, learning objective, etc.). It is a good idea to align this calendar with the

1828 Communications Plan to be able to send out reminder communications and ensure that  
1829 instructors and materials are identified and allocated well in advance.

#### 1830 **4.6. Determining Post-Implementation Activities**

1831 Once any CPLP element has been delivered or implemented, the post-implementation activities  
1832 that fuel assessment and improvements should be managed. These will include:

- 1833 • Sending post-training feedback surveys
- 1834 • Conducting instructor feedback surveys
- 1835 • Determining attendance and completion rates
- 1836 • Other mandated or organizational reporting
- 1837 • Budget reconciliation (i.e., did the CPLP element implementation meet budget  
1838 requirements or go over or under?)

1839 For some awareness elements, measuring audience engagement is less straightforward,  
1840 especially for passive items like posters or email signatures. Nevertheless, it is possible to  
1841 measure impact. One method could include surveying a sample of users to discuss their  
1842 familiarity with the messaging or whether they have practiced any of the tips.

1843

1844

## 1845 **5. Assessment and Improvement of the CPLP**

1846 An effective CPLP meets the needs of the learners and the organization by measuring and  
1847 evaluating the performance of the Program on a continual basis. This requires up-to-date  
1848 knowledge, awareness, and understanding of the legal and regulatory compliance requirements  
1849 for the organization and the cybersecurity and privacy risks that may impact the organization.  
1850 The Learning Program Manager works with organizational leaders, training staff, and learners to  
1851 share performance reporting and decision-making throughout all phases of the CPLP. Both the  
1852 analysis of organizational risks (e.g., employee responses to practical exercises) and review of  
1853 the efficacy of material (e.g., learner feedback responses to courses) are important in the  
1854 continual improvement of a CPLP in an evolving threat landscape.

### 1855 **5.1. Steps for Assessing and Improving the CPLP**

1856 The process for assessing and improving the CPLP may vary by organization and available  
1857 resources. Consider the following steps before evaluating the CPLP's performance, whether for  
1858 the entire CPLP, per audience segment, or for a single CPLP element, such as a new training  
1859 course:

- 1860 1. Create a CPLP Assessment Report
- 1861 2. Agree on the changes needed to the CPLP
- 1862 3. Evaluate budget requirements for program improvement
- 1863 4. Review and update the strategic plan
- 1864 5. Implement changes into the next revisions of the program elements and schedule

### 1865 **5.2. Create a CPLP Assessment Report**

1866 At the end of a campaign, each quarter, or annually, the Learning Program Manager should  
1867 create a summary document that is suitable for review with senior leadership. This report will  
1868 provide an analysis of attendance, feedback, measurements, and other metrics and help to  
1869 identify action items, areas of improvement, and next steps. It should be tailored for the senior  
1870 leadership reader, using language and framing that is appropriate. Avoid using technical jargon  
1871 without explanation.

1872 Key elements of an Assessment Report include:

- 1873 • Measurements and metrics
- 1874 • Compliance information
- 1875 • Evaluating CPLP effectiveness
- 1876 • CPLP improvement efforts

1877 The Learning Program Manager will have established their Program Metrics Plan during the  
1878 planning stage (see Section 2.4) and should strive to include a number of different quantitative  
1879 and qualitative tools. Metrics are an important and effective tool for determining an  
1880 organization's cybersecurity and privacy learning needs. Metrics monitor the accomplishment of  
1881 the program goals and objectives by quantifying the level of implementation, effectiveness, and

1882 efficiency of the program while identifying possible improvements. Include results from both  
1883 quantitative and qualitative measurement instruments.

### 1884 **5.2.1. Compliance Reporting**

1885 One element of the report is to indicate whether the CPLP has met the regulatory compliance  
1886 requirements for the organization. The Learning Program Manager should be aware of all  
1887 regulations that require reports to be created for their organization. As a subject-matter expert on  
1888 the topic of providing training programs for the agency or organization's employees, the  
1889 Learning Program Manager should typically engage in self-development processes that maintain  
1890 an awareness of these needs. In some organizations, this may all be handled by a single  
1891 individual or group that is assigned to manage legal and regulatory compliance. For those  
1892 organizations where the duties are separated, it is critical to maintain collaborative  
1893 communication to ensure that the program meets compliance.

1894 A fully developed and integrated CPLP may become a useful tool for supporting enterprise risk  
1895 management, although many are initially developed to address compliance requirements in laws,  
1896 regulations, policies, or standards. Meeting these compliance measures is often the primary focus  
1897 of higher level leadership, but should be only the starting point for a robust CPLP program.  
1898 Examples of common quantifiable metrics to demonstrate CPLP compliance include training a  
1899 certain percentage of the workforce and the results of practical exercises. Organizations should  
1900 determine which compliance measures they must achieve and consider those inputs when  
1901 developing the CPLP.

1902 Learning Program Managers should work with policy owners to ensure that the results of the  
1903 learning efforts satisfy compliance requirements. The CPLP needs to build in methods that allow  
1904 for this type of reporting. That conversation could include questions such as:

- 1905 • Which personnel received (or participated in) the learning element?
- 1906 • How well does the participation level match the goal of user coverage?
- 1907 • How far should the CPLP go in pursuit of expected coverage?
- 1908 • Have individuals in compliance-identified roles met their learning requirements?

### 1909 **5.3. Evaluating CPLP Effectiveness**

1910 Because the focus of this program is on learning and mastering content, it is important to analyze  
1911 issues that are typically assigned to the learning and educational branch of the organization. The  
1912 cybersecurity and privacy Learning Program Manager needs to be involved in the creation of  
1913 course material to ensure that it is accurate, relevant, and timely. This requires analyzing the  
1914 accuracy, quality, and appropriateness of delivery of the material in the context of the desired  
1915 outcomes. The Learning Program Manager should expect to take an active role in course  
1916 development and to follow up after teaching to determine whether the material was delivered as  
1917 intended.

1918 Another primary goal of a CPLP is to empower users to demonstrate better decision-making  
1919 behaviors. While these types of behavioral improvements tend to be more difficult to measure,

1920 working with functional managers and other staff may help in the development of measurable  
1921 objectives to assess behavioral changes.

### 1922 **5.3.1. Instructor Evaluation**

1923 Each CPLP will determine whether they can support a dedicated in-house team of instructors.  
1924 Others may need to use contractors to implement courses and training. In some organizations, the  
1925 cybersecurity Learning Program Manager is also the privacy Learning Program Manager and  
1926 lead instructor for all of the above. Regardless of the size of the organization, it is important to  
1927 consider the required skills of the instructor. Learning Program Managers should work with  
1928 leadership to find the right instructors for their personnel and their CPLP's learning objectives. It  
1929 is also important to monitor the performance of instructors via observation and other forms of  
1930 feedback.

1931 Instructors can also give feedback on the learning material. Learning Program Managers should  
1932 work with the instructors to review the material for effectiveness. Instructors frequently provide  
1933 feedback on:

- 1934 • Perceived accuracy
- 1935 • Ease of instruction and ease of learner understanding
- 1936 • Adequacy of materials to support content
- 1937 • Relevance and timeliness of materials

### 1938 **5.3.2. Learner Performance and Feedback**

1939 An effective CPLP will include evaluations of learner performance and ask personnel for  
1940 feedback.

1941 There are many techniques for addressing how well the learner has absorbed the content and will  
1942 be able to apply it. The most common technique for measuring learner performance is the use of  
1943 in-course or post-course evaluations. Questions or assessments should be developed at a level  
1944 commensurate with both the complexity of the material and the level of understanding expected  
1945 of the learner. Note: these evaluations won't show whether there was long-term learning or  
1946 application of that learning. Refer back to other ways of measuring employee behaviors as a  
1947 long-term way to measure learner performance. Additionally, these measures should be  
1948 aggregated across the workforce or a group, not necessarily attributed to a unique learner.

1949 As needed, the Learning Program Manager should work with other functional managers to  
1950 identify weaknesses in the knowledge and skills of personnel, whether individually or by role, to  
1951 determine where results do not match the goals and learning objectives for each training element.

1952 Helping personnel to provide CPLP feedback is recommended for encouraging a sense of shared  
1953 responsibility in the cybersecurity and privacy culture of the organization. Learning Program  
1954 Managers should consider how they can provide easy feedback mechanisms throughout their  
1955 program.

1956 **5.3.3. Review of the CPLP Assessment Report With Senior Leadership**

1957 As a final step, the Learning Program Manager will meet with the Senior Leadership Committee  
1958 to review the performance of the program, address new organizational risks or concerns to  
1959 include in the training program content, and identify any areas for significant improvement. This  
1960 phase helps to ensure that the cyclical approach depicted in **Fig. 1** is an ongoing and continual  
1961 effort.

1962 **5.4. Continuous Monitoring and Improvement**

1963 NIST SP 800-53, section 1.3, includes the organizational responsibility of “[c]ontinuous  
1964 monitoring of information systems and organizations to determine the ongoing effectiveness of  
1965 controls, changes in information systems and environments of operation, and the state of security  
1966 and privacy organization-wide.” In this context, the continuous monitoring and improvement  
1967 refers to the iterative nature of reviewing, updating, and maintaining the program in alignment  
1968 with requirements and best practices. Based on the CPLP Assessment Report and any new  
1969 requirements (e.g., legislative, organizational, system changes, risk-related, etc.), the Learning  
1970 Program Manager will be able to identify opportunities for improvement. As part of the iterative  
1971 nature of a CPLP, the assessment and continual improvement process can happen during any  
1972 phase of the CPLP. Continual improvement is simply the concept of periodically revisiting each  
1973 step of planning, design, development, and implementation to ensure that the CPLP meets the  
1974 identified goals and requirements in the strategic plan. The continual improvement process does  
1975 not imply inherent shortfalls in the program. Rather, it acknowledges the constantly shifting  
1976 needs of an organization to manage resources and risks.

1977 Ultimately, the goal of the CPLP is to enable the organization to withstand cybersecurity and  
1978 privacy-related risks to information and assets. The personnel of the organization are a crucial  
1979 part of creating the positive cultural norms that will both support the aims of the CPLP and  
1980 contribute to greater success in changing behaviors. Avoid efforts to penalize those who do not  
1981 adapt to the culture as well as others. Rather, shine a light on teams and departments that  
1982 improve performance or establish best practices. Find ways to celebrate personnel who are  
1983 building the organization’s CPLP culture, and share information about the CPLP’s performance  
1984 when appropriate. If feedback indicates that a change is required to the training because  
1985 something is not working, ensure that the program is nimble enough for that adjustment to be  
1986 implemented. Do not wait for the end of the year or another arbitrary time period.

1987 The goals of continual improvement do not need to be built on the ashes of past failures but  
1988 should be seen as an opportunity to grow and strengthen a critical program. A positive  
1989 cybersecurity and privacy culture celebrates successes while acknowledging the ever-present  
1990 risks to the organization.

1991

1992

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2047 **Appendix A. Examples of Cybersecurity and Privacy Learning Program Maturity Levels**

2048 The following example is adapted from the FY21 Inspector General FISMA Metrics for Security Training [12] and provides one  
2049 method for assessing the maturity of a Learning Program. Similar to other business or quality maturity models, this example can help  
2050 measure progress and set strategic goals for optimizing the Learning Program. A fully “mature” program is an integrated operational  
2051 element of the system and processes and is continually monitored and improved.

Question	Ad Hoc	Defined	Consistently Implemented	Managed and Measurable	Optimized
The extent to which the roles and responsibilities of the Learning Program have been defined, communicated, implemented, and appropriately resourced	Roles and responsibilities have not been defined, communicated, or implemented across the organization nor appropriately resourced.	Roles and responsibilities have been defined, communicated, and implemented across the organization, and resource requirements have been established.	Individuals are performing the roles and responsibilities that have been defined across the organization.	Resources are allocated in a risk-based manner for stakeholders to consistently implement, and stakeholders are held accountable for carrying out their roles and responsibilities effectively.	
The extent to which the organization utilizes an assessment of the skills, knowledge, and abilities of its workforce to provide tailored and specialized learning content	The organization has not defined its processes for assessing the knowledge, skills, and abilities of its workforce.	The organization has defined its processes for assessing the knowledge, skills, and abilities of its workforce to determine its learning needs. It periodically updates its assessment to account for a changing risk environment.	The organization has assessed the knowledge, skills, and abilities of its workforce; tailored its learning content; and identified its skill gaps. It periodically updates its assessment to account for a changing risk environment. In addition, the assessment serves as a key input to updating the organization’s learning strategy and plans.	The organization has addressed its identified knowledge, skill, and ability gaps through training or talent acquisition.	The organization’s personnel collectively possess a training level such that the organization can demonstrate that security incidents resulting from personnel actions or inactions are being reduced over time.
The extent to which the organization utilizes a learning strategy and plan that leverage skills assessment and are	The organization has not defined its security learning strategy or plan for developing, implementing, and	The organization has defined its learning strategy and plan for developing, implementing, and	The organization has consistently implemented its organization-wide	The organization monitors and analyzes qualitative and quantitative performance measures on the effectiveness of its	The organization’s Learning Program activities are integrated across other security-related domains. For

Question	Ad Hoc	Defined	Consistently Implemented	Managed and Measurable	Optimized
<p>adapted to the organization’s mission and risk environment.</p>	<p>maintaining a Learning Program that is tailored to its mission and risk environment.</p>	<p>maintaining a Learning Program that is tailored to its mission and risk environment.</p>	<p>learning strategy and plan.</p>	<p>learning strategies and plans. The organization ensures that data-supporting metrics are obtained accurately, consistently, and in a reproducible format.</p>	<p>instance, common risks, control weaknesses, and other outputs of the agency’s risk management and continual monitoring activities inform any updates that need to be made to the Learning Program.</p>
<p>The extent to which the organization ensures that the Learning Program is provided to all personnel and is tailored based on its mission, risk environment, and types of information systems</p>	<p>The organization has not defined its learning policies, procedures, or related material based on its mission, risk environment, or the types of information systems that its users have access to.</p> <p>The organization has not defined its processes for ensuring that all personnel are provided with training upon initial access to the system and periodically thereafter.</p> <p>The organization has not defined its processes for evaluating or obtaining feedback on its Learning Program to make continual improvements.</p>	<p>The organization has defined and tailored its learning policies, procedures, related material, and delivery methods based on identified requirements and the types of information systems that its users have access to.</p> <p>The organization has defined its processes for ensuring that all personnel, including contractors, are provided with training upon initial access to the system and periodically thereafter.</p> <p>The organization has defined its processes for evaluating and obtaining feedback on its Learning Program and uses that</p>	<p>The organization ensures that its learning policies and procedures are consistently implemented.</p> <p>The organization ensures that all appropriate users complete the organization’s training upon initial access to the system and periodically thereafter and maintains completion records.</p> <p>The organization obtains feedback on its Learning Program and uses that information to make improvements.</p>	<p>The organization measures the effectiveness of its Learning Program by, for example, conducting practical exercises and following up with additional awareness, training, or disciplinary action, as appropriate.</p> <p>The organization monitors and analyzes qualitative and quantitative performance measures on the effectiveness of its learning policies, procedures, and practices.</p> <p>The organization ensures that data-supporting metrics are obtained accurately, consistently, and in a reproducible format.</p>	<p>The organization has institutionalized a process of continual improvement that incorporates advanced learning practices and technologies.</p> <p>On a near real-time basis, the organization actively adapts its learning policies, procedures, and processes to a changing cybersecurity and privacy landscape and provides learning content, as appropriate, on evolving and sophisticated threats and problematic data actions.</p>

Question	Ad Hoc	Defined	Consistently Implemented	Managed and Measurable	Optimized
		information to make continual improvements.			
<p>The extent to which the organization ensures that specialized learning is provided to individuals with significant security or privacy responsibilities</p>	<p>The organization has not defined its security or privacy learning policies, procedures, or related materials based on its mission, risk environment, or the types of roles with significant security or privacy responsibilities.</p> <p>The organization has not defined its processes for ensuring that personnel with significant security or privacy roles and responsibilities are provided with specialized learning content and does not offer additional learning opportunities.</p>	<p>The organization has defined its security and privacy learning policies, procedures, and related material based on its requirements, mission, risk environment, and the types of roles with significant security and privacy responsibilities.</p> <p>The organization has defined its processes for ensuring that personnel with assigned security and privacy roles and responsibilities are provided with specialized security learning material and periodically given additional learning opportunities.</p>	<p>The organization ensures that its security and privacy learning policies and procedures are consistently implemented.</p> <p>The organization ensures that individuals with significant security and privacy responsibilities complete the organization's defined specialized learning and are provided with periodic enhancements or additional relevant learning opportunities.</p> <p>The organization maintains completion records for specialized learning taken by individuals with significant security and privacy responsibilities.</p> <p>The organization obtains feedback on its security and privacy Learning Program and uses that information to make improvements.</p>	<p>The organization ensures that its security and privacy learning policies and procedures are consistently implemented.</p> <p>The organization ensures that individuals with significant security and privacy responsibilities complete the organization's specialized security and privacy learning and provides periodic enhancements and additional relevant learning opportunities.</p> <p>The organization maintains completion records for specialized learning taken by individuals with significant security and privacy responsibilities.</p> <p>The organization obtains feedback on its security and privacy Learning Program and uses that information to make improvements.</p>	<p>The organization has institutionalized a process of continual improvement that incorporates advanced security and privacy learning practices and technologies.</p> <p>On a near real-time basis, the organization actively adapts its security and privacy learning policies, procedures, and processes to a changing cybersecurity and privacy landscape and provides learning material, as appropriate, on evolving and sophisticated threats and problematic data actions.</p>

2053 **Appendix B. Glossary**

2054 Other terms not defined herein may be found in the NIST Glossary [13].

2055 **awareness**

2056 The ability of the user to recognize and avoid behaviors that could compromise cybersecurity and to act wisely and  
2057 cautiously to increase cybersecurity.

2058 **awareness content**

2059 Content that is designed and implemented to help employees realize how their actions may impact or influence  
2060 vulnerabilities and threats. Organizations provide various types of awareness material (e.g., posters, newsletters,  
2061 websites) so that employees can realize their roles in protecting cyber assets.

2062 **awareness training**

2063 The foundational cybersecurity or privacy training program for all personnel. It is designed to help users understand  
2064 the role that they play in protecting information, cybersecurity, and privacy-related assets. It often consists of  
2065 instructor-led, online courses, exercises, or other methods that inform users of the acceptable use of and risk to the  
2066 organization's systems.

2067 *Note:* This is referred to as “literacy” training in the NIST SP 800-53 Awareness and Training (AT) control  
2068 family [8].

2069 Also see: *training*.

2070 **certification**

2071 A designation earned to ensure qualifications to perform a job or task. Often issued by a professional organization,  
2072 industry vendor, or employer to signify an achievement following a course of study.

2073 **Chief Data Officer**

2074 A senior executive responsible for the utilization and governance of data across the agency or organization.

2075 **Chief Financial Officer**

2076 A senior member responsible for managing the financial actions of an agency or organization.

2077 **Chief Learning Officer**

2078 A senior-level executive who oversees all learning and employee development programs within an agency or  
2079 organization.

2080 **Chief Privacy Officer**

2081 The senior official who is designated by the head of each agency and has agency-wide responsibilities for privacy,  
2082 including the implementation of privacy protections; compliance with federal laws, regulations, and policies related  
2083 to privacy; the management of privacy risks at the agency; and a central policy-making role in the agency's  
2084 development and evaluation of legislative, regulatory, and other policy proposals.

2085 **competency**

2086 An individual's ability to complete a task or tasks within the context of a work role.

2087 From OPM: A *competency* is a measurable pattern of knowledge, skills, abilities, behaviors, and other  
2088 characteristics that an individual needs to perform work roles or occupational functions successfully.

2089 Competencies specify the “how” of performing job tasks, or what the person needs to do the job  
2090 successfully.

2091 Additional information is available at [https://www.opm.gov/policy-data-oversight/assessment-and-  
2092 selection/competencies/](https://www.opm.gov/policy-data-oversight/assessment-and-selection/competencies/).

2093 **confidentiality**

2094 Preserving authorized restrictions on information access and disclosure, including means for protecting personal  
2095 privacy and proprietary information.

- 2096 **cyber range**  
2097 This technique provides a safe environment (sandbox) to deliver hands-on realistic training, scenarios, challenges,  
2098 and exercises in an easy-to-access web-based environment.
- 2099 **cybersecurity**  
2100 The prevention of damage to, protection of, and restoration of computers, electronic communications systems,  
2101 electronic communications services, wire communication, and electronic communication, including information  
2102 contained therein, to ensure its availability, integrity, authentication, confidentiality, and non-repudiation.
- 2103 **Data privacy**  
2104 a condition that safeguards human autonomy and dignity through various means including confidentiality,  
2105 predictability, manageability, and disassociability.
- 2106 **Data Management Officer**  
2107 Responsible for overseeing and carrying out the data management tasks of research projects. Main duties and  
2108 responsibilities include data collection, or the formulation, implementation, and enforcement of proper data  
2109 collection policies and procedures. Trains reporting agencies on data collection tools and equipment.
- 2110 **disassociability**  
2111 Enabling the processing of data or events without association to individuals or devices beyond the operational  
2112 requirements of the system.
- 2113 **gap analysis**  
2114 The process of comparing current Learning Program or activity performance with the desired, expected  
2115 performance.
- 2116 **information technology**  
2117 (A) with respect to an executive agency means any equipment or interconnected system or subsystem of equipment,  
2118 used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control,  
2119 display, switching, interchange, transmission, or reception of data or information by the executive agency, if the  
2120 equipment is used by the executive agency directly or is used by a contractor under a contract with the executive  
2121 agency that requires the use— (i) of that equipment; or (ii) of that equipment to a significant extent in the  
2122 performance of a service or the furnishing of a product; (B) includes computers, ancillary equipment (including  
2123 imaging peripherals, input, output, and storage devices necessary for security and surveillance), peripheral  
2124 equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar  
2125 procedures, services (including support services), and related resources; but (C) does not include any equipment  
2126 acquired by a federal contractor incidental to a federal contract. [14]
- 2127 **integrity**  
2128 Guarding against improper information modification or destruction; includes ensuring information non-repudiation  
2129 and authenticity.
- 2130 **learning objectives**  
2131 Identifies the outcomes that the learning program sub-component or module should strive to meet for each of the  
2132 participants and their associated roles. which helps to build an understanding of risks and explain everyone's role in  
2133 reducing, managing, and mitigating risks.
- 2134 **Learning Program**  
2135 Consists of numerous elements led by the Learning Program Manager(s), who develop a Strategic Plan to deliver a  
2136 right-sized program to reduce organizational cybersecurity and privacy risks via workforce education and training.  
2137 The Learning Program operates throughout the year and incorporates plans for ongoing improvements that are based  
2138 on rigorous assessments and metrics that support compliance and other mandated reporting. A supportive objective  
2139 is to develop a positive cybersecurity and privacy culture and not to blame or shame the workforce for lapses or  
2140 errors.
- 2141 **Learning Program Management**  
2142 The people and processes that support the cybersecurity and privacy Learning Program.

2143 **Learning Program Manager**

2144 The people in the organization responsible for the development, procurement, integration, modification, operation,  
2145 maintenance, or final disposition of the elements of the Learning Program(s). In some organizations, there will be  
2146 multiple iterations of Learning Programs where cybersecurity and privacy are managed separately.

2147 **Learning Program Plan**

2148 A formal document that provides an overview of an agency's cybersecurity and privacy Learning Program,  
2149 including a description of the structure of the Learning Program, the resources dedicated to the Learning Program,  
2150 the role of senior agency officials and staff, and the strategic goals and objectives of the Learning Program as a  
2151 control planned for meeting applicable privacy requirements and managing privacy risks.

2152 **literacy**

2153 An individual's familiarity with a basic set of knowledge.

2154 **manageability**

2155 Providing the capability for granular administration of data, including alteration, deletion, and selective disclosure.

2156 **needs assessment**

2157 The process of identifying gaps in learning and the needs of learning activities.

2158 **predictability**

2159 Enabling reliable assumptions by individuals, owners, and operators about data and their processing by a system,  
2160 product, or service.

2161 **privacy event**

2162 The occurrence or potential occurrence of problematic data actions.

2163 **privileged network account**

2164 A network account with elevated privileges which is typically allocated to system administrators, network  
2165 administrators, DBAs, and others who are responsible for system/application control, monitoring, or administration  
2166 functions.

2167 **privileged user**

2168 A user who is authorized (and therefore trusted) to perform security-relevant functions that ordinary users are not  
2169 authorized to perform. This may include special access to software applications or web publishing and will require  
2170 additional training and the signing of an acceptable use policy. A user with a privileged account.

2171 **problematic data action**

2172 A data action that could cause an adverse effect for individuals.

2173 **program metrics**

2174 Tools designed to facilitate decision-making and improve performance and accountability through the collection,  
2175 analysis, and reporting of relevant performance-related data.

2176 **role-based training (RBT)**

2177 A multi-step process in the Learning Program that begins with defining the significant cybersecurity or privacy work  
2178 roles in the organization, as well as the personnel aligned to the designated work role. The learning material is then  
2179 assigned, acquired, or developed based on the tasks necessary to perform the work role. (See the NICE Framework  
2180 [3] for "work role".)

2181 *NOTE:* In addition, NIST SP 800-53 control AT-3 [8] provides the following on Role-Based Training:  
2182 Comprehensive role-based training addresses management, operational, and technical roles and  
2183 responsibilities covering physical, personnel, and technical controls. Role-based training also includes  
2184 policies, procedures, tools, methods, and artifacts for the cybersecurity and privacy roles defined.  
2185 Organizations provide the training necessary for individuals to fulfill their responsibilities related to  
2186 operations and supply chain risk management within the context of organizational cybersecurity and  
2187 privacy programs. Role-based training also applies to contractors who provide services to federal agencies.

2188 **significant cybersecurity or privacy responsibilities**

2189 The preferred terminology herein for identifying those whose roles in the organization necessitate ongoing role-  
2190 based training. These individuals have work-related responsibilities beyond those of All Users and will need to  
2191 participate in general as well as specialized Learning Program activities.

2192 *NOTE:* From FISMA FY2014 CIO Metrics [12]: Those with significant cybersecurity responsibilities  
2193 include all users who have one or more privileged network user account and all other users who have  
2194 managerial or operational responsibilities that allow them to increase or decrease cybersecurity.

2195 **synchronous training**

2196 Training in which instructors and students are scheduled to participate together, whether it is in a virtual or a  
2197 physical classroom-based learning environment.

2198 **tabletop materials**

2199 Materials designed for a discussion-based exercise where personnel with roles and responsibilities in a particular IT  
2200 plan meet in a classroom setting or in breakout groups to discuss their roles during an emergency and their responses  
2201 to a particular emergency situation. A facilitator initiates the discussion by presenting a scenario and asking  
2202 questions based on the scenario.

2203 *NOTE:* From NIST SP 800-84, Tabletop exercises typically include the following documentation:

- 2204 ○ Briefing. A briefing is created for the participants; it includes an agenda and logistics information.
- 2205 ○ Facilitator Guide. The facilitator guide includes the following:
  - 2206 – The purpose for conducting the exercise
  - 2207 – The exercise’s scope and objectives
  - 2208 – The exercise’s scenario, which is a sequential, narrative account of a hypothetical incident that
  - 2209 provides the catalyst for the exercise and is intended to introduce situations that will inspire
  - 2210 responses and thus allow demonstration of the exercise objectives
  - 2211 – A list of questions regarding the scenario that address the exercise objectives<sup>14</sup>
  - 2212 – A copy of the IT plan being exercised.

2213 The types of questions documented in the facilitator guide should be tailored to the participants. For  
2214 example, if senior-level personnel are the participants, the questions should be of a more general, high-level  
2215 nature and focus on decision-making and oversight, which are consistent with their roles and  
2216 responsibilities within the plan. If operational personnel are the participants, the questions should typically  
2217 be focused on specific procedures and processes that are followed to carry out roles and responsibilities.

- 2218 ○ Participant Guide. The participant guide includes the same information as the facilitator guide without
- 2219 the list of questions. Participant guides contain a modified, shorter list of questions to orient
- 2220 participants to the types of issues that may be discussed during the exercise.
- 2221 ○ After Action Report.

2222 **training**

2223 Instruction to enhance the employee’s capacity to perform specific job functions and tasks. It is a learning activity  
2224 that focuses on skills, concepts, knowledge, and attitudes related to performing a job. It is designed to change what  
2225 employees know and how they work.

2226 *NOTE:* References to training in US law: See U.S. Code § 4101 – Definitions [14]: (4) “training” means  
2227 the process of providing for and making available to an employee, and placing or enrolling the employee  
2228 in, a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of  
2229 instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal,  
2230 administrative, or other fields which will improve individual and organizational performance and assist in  
2231 achieving the agency’s mission and performance goals.

- 2232 **virtual-led**  
2233 When instruction occurs in a virtual or simulated environment and is presented or facilitated by an instructor in real  
2234 time.
- 2235 **warning banner**  
2236 The opening screen that informs users of the implications of accessing a computer resource (e.g., consent to  
2237 monitor); a security banner; system use notification.
- 2238 **web-based training**  
2239 “Attendees” of an internet-based session can study independently and learn at their own pace. Testing and  
2240 accountability features can be built-in to gauge performance. Web-based training can include video, audio, and  
2241 interactive techniques, such as drag-and-drop or fill in the blank.
- 2242 **work role**  
2243 A way of describing a grouping of work for which someone is responsible or accountable. Work Role names are not  
2244 synonymous with job titles. Some work roles may coincide with a job title depending on an organization’s use of job  
2245 titles. Additionally, work roles are not synonymous with occupations. A single work role (e.g., Software Developer)  
2246 may apply to those with many varying job titles (e.g., software engineer, coder, application developer). Conversely,  
2247 multiple roles could be combined to create a particular job. This additive approach supports improved modularity  
2248 and illustrates the fact that all learners in the workforce perform numerous tasks in various roles, regardless of their  
2249 job titles. [3]