

## Standard Development Timeline

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*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

### Development Steps Completed

1. SAR posted for comment (March 20, 2008).
2. SC authorized moving the SAR forward to standard development (July 10, 2008).

### Description of Current Draft

This is the first posting of Version 5 of the CIP Cyber Security Standards for a 45-day formal comment period. An initial concept paper, Categorizing Cyber Systems — An Approach Based on BES Reliability Functions, was posted for public comment in July 2009. An early draft consolidating CIP-002 – CIP-009, numbered CIP-010-1 and CIP-011-1, was posted for public informal comment in May 2010. This version (Version 5) reverts to the original organization of the standards with some changes and addresses the balance of the FERC directives in its Order 706 approving Version 1 of the standards.

Anticipated Actions	Anticipated Date
45-day Formal Comment Period with Parallel Initial Ballot	11/03/2011
30-day Formal Comment Period with Parallel Successive Ballot	March 2012
Recirculation ballot	June 2012
BOT adoption	June 2012

## Effective Dates

1. **18 Months Minimum** – The Version 5 CIP Cyber Security Standards shall become effective on the later of January 1, 2015, or the first calendar day of the seventh calendar quarter after the date of the order providing applicable regulatory approval. Notwithstanding any order to the contrary, CIP-002-4 through CIP-009-4 do not become effective, and CIP-002-3 through CIP-009-3 remain in effect and are not retired until the effective date of the Version 5 CIP Cyber Security Standards under this implementation plan.<sup>1</sup>
2. In those jurisdictions where no regulatory approval is required, the standards shall become effective on the first day of the seventh calendar quarter following Board of Trustees approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

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<sup>1</sup> In jurisdictions where CIP-002-4 through CIP-009-4 have not yet become effective according to their implementation plan (even if approved by order), this implementation plan and the Version 5 CIP Cyber Security Standards supersede and replace the implementation plan and standards for CIP-002-4 through CIP-009-4.

## Version History

Version	Date	Action	Change Tracking
1	1/16/06	R3.2 — Change “Control Center” to “control center”	3/24/06
2	9/30/09	Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards. Removal of reasonable business judgment. Replaced the RRO with the RE as a responsible entity. Rewording of Effective Date. Changed compliance monitor to Compliance Enforcement Authority.	
3	12/16/09	Updated version number from -2 to -3 Approved by the NERC Board of Trustees	
3	3/31/10	Approved by FERC	
4	1/24/11	Update version from “3” to “4”. Approved by the NERC Board of Trustees	Update to conform to changes to CIP-002-4 (Project 2008-06)
5	TBD	Modified to coordinate with other CIP standards and to revise format to use RBS Template	

### **Definitions of Terms Used in the Standard**

*See the associated “Definitions of Terms Used in Version 5 CIP Cyber Security Standards,” which consolidates and includes all newly defined or revised terms used in the proposed Version 5 CIP Cyber Security Standards.*

*When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.*

## A. Introduction

1. **Title:** Cyber Security — Security Management Controls
2. **Number:** CIP-003-5
3. **Purpose:** Standard CIP-003-5 requires that Responsible Entities have minimum security management controls in place to protect BES Cyber Assets and BES Cyber Systems.
4. **Applicability:**
  - 4.1. **Functional Entities:** For the purpose of the requirements contained herein, the following list of Functional Entities will be collectively referred to as “Responsible Entities.” For requirements in this standard where a specific Functional Entity or subset of Functional Entities are the applicable entity or entities, the Functional Entity or Entities are specified explicitly.
    - 4.1.1 **Balancing Authority**
    - 4.1.2 **Distribution Provider** that owns Facilities that are part of any of the following systems or programs designed, installed, and operated for the protection or restoration of the BES:
      - A UFLS program required by a NERC or Regional Reliability Standard
      - A UVLS program required by a NERC or Regional Reliability Standard
      - A Special Protection System or Remedial Action Scheme required by a NERC or Regional Reliability Standard
      - A Transmission Protection System required by a NERC or Regional Reliability Standard
      - Its Transmission Operator's restoration plan
    - 4.1.3 **Generator Operator**
    - 4.1.4 **Generator Owner**
    - 4.1.5 **Interchange Coordinator**
    - 4.1.6 **Load-Serving Entity** that owns Facilities that are part of any of the following systems or programs designed, installed, and operated for the protection or restoration of the BES:
      - A UFLS program required by a NERC or Regional Reliability Standard
      - A UVLS program required by a NERC or Regional Reliability Standard
    - 4.1.7 **NERC**
    - 4.1.8 **Regional Entity**
    - 4.1.9 **Reliability Coordinator**

**4.1.10 Transmission Operator**

**4.1.11 Transmission Owner**

**4.2. Facilities:**

**4.2.1 Load Serving Entity:** One or more Facilities that are part of any of the following systems or programs designed, installed, and operated for the protection of the BES:

- A UFLS program required by a NERC or Regional Reliability Standard
- A UVLS program required by a NERC or Regional Reliability Standard

**4.2.2 Distribution Providers:** One or more Facilities that are part of any of the following systems or programs designed, installed, and operated for the protection or restoration of the BES:

- A UFLS program required by a NERC or Regional Reliability Standard
- A UVLS program required by a NERC or Regional Reliability Standard
- A Special Protection System or Remedial Action Scheme required by a NERC or Regional Reliability Standard
- A Transmission Protection System required by a NERC or Regional Reliability Standard
- Its Transmission Operator's restoration plan

**4.2.3 All other Responsible Entities: All BES Facilities**

**4.2.4 Exemptions:** The following are exempt from Standard CIP-003-5

**4.2.4.1** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.

**4.2.4.2** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.

**4.2.4.3** In nuclear plants, the systems, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F. R. Section 73.54.

**4.2.4.4** Except for R1, R5 and R6, Responsible Entities that, in compliance with Standard CIP-002-5, identify that they have no BES Cyber Systems

**5. Background:**

Standard CIP-003-5 exists as part of a suite of CIP Standards related to cyber security. CIP-002-5 requires the initial identification and categorization of BES Cyber Systems. CIP-003-5, CIP-004-5, CIP-005-5, CIP-006-5, CIP-007-5, CIP-008-5, CIP-009-5, CIP-010-1 and CIP-011-1 require a minimum level of organizational, operational and procedural

controls to mitigate risk to BES Cyber Systems. This suite of CIP Standards is referred to as the *Version 5 CIP Cyber Security Standards*.

Each requirement opens with “*Each Responsible Entity shall implement one or more documented processes that include the required items in [Table Reference].*” The referenced table requires the specific elements in the procedures for a common subject matter as applicable.

Measures for the initial requirement are simply the documented processes themselves. Measures in the table rows provide examples of evidence to show documentation and implementation of specific elements required in the documented processes. A numbered list in the measure means the evidence example includes all of the items in the list. In contrast, a bulleted list provides multiple options of acceptable evidence. These measures serve to provide guidance to entities in acceptable records of compliance and should not be viewed as an inclusive list.

The term *documented processes* refers to a set of required instructions specific to the Responsible Entity and to achieve a specific outcome. This term does not infer any naming or approval structure beyond what is stated in the requirements. An entity should include as much as they feel necessary in their documented processes, but they must address the applicable requirements in the table.

The terms *program* and *plan* are sometimes used in place of *documented processes* where it makes sense and is commonly understood. For example, documented processes describing a response are typically referred to as *plans* (i.e. incident response plans and recovery plans). Likewise, a security plan can describe an approach involving multiple procedures to address a broad subject matter.

Similarly, the term *program* may refer to the organization’s overall implementation of its policies, plans and procedures involving a subject matter. Examples in the Standards include the personnel risk assessment program and the personnel training program. The full implementation of the CIP Cyber Security Standards could also be referred to as a program. However, the terms *program* and *plan* do not imply any additional requirements beyond what is stated in the Standards.

### **Applicability**

Each table row has an applicability column to further define the scope to which a specific requirement row applies. The CSO706 SDT adapted this concept from the NIST Risk Management Framework as a way of applying requirements more appropriately based on impact and connectivity characteristics. The following conventions are used in the applicability column as described.

- **All Responsible Entities** – Applies to all Responsible Entities listed in the Applicability section of the Standard. This requirement applies at an organizational level rather than individually to each BES Cyber System. Requirements having this applicability comprise basic elements of an organizational CIP cyber security program.

- **High Impact BES Cyber Systems** – Applies to BES Cyber Systems categorized as High Impact according to the CIP-002-5 identification and categorization processes. Responsible Entities can implement common controls that meet requirements for multiple High and Medium Impact BES Cyber Systems. For example, a single training program could meet the requirements for training personnel across multiple BES Cyber Systems.
- **Medium Impact BES Cyber Systems** – Applies to BES Cyber Systems categorized as Medium Impact according to the CIP-002-5 identification and categorization processes.
- **Medium Impact BES Cyber Systems at Control Centers** – Only applies to BES Cyber Systems located at a Control Center and categorized as Medium Impact according to the CIP-002-5 identification and categorization processes.
- **Medium Impact BES Cyber Systems with External Routable Connectivity** – Only applies to Medium Impact BES Cyber Systems with External Routable Connectivity. This also excludes Cyber Assets in the BES Cyber System that cannot be directly accessed through External Routable Connectivity.
- **Low Impact BES Cyber Systems with External Routable Connectivity** – Applies to each Low Impact BES Cyber Systems with External Routable Connectivity according to the CIP-002-5 identification and categorization process, which includes all other BES Cyber Systems not categorized as High or Medium.
- **Associated Electronic Access Control or Monitoring Systems** – Applies to each Electronic Access Control or Monitoring System associated with a corresponding High or Medium Impact BES Cyber Systems. Examples include, but are not limited to firewalls, authentication servers, and log monitoring and alerting systems
- **Associated Physical Access Control Systems** – Applies to each Physical Access Control System associated with a corresponding High or Medium Impact BES Cyber Systems.
- **Associated Protected Cyber Assets** – Applies to each Protected Cyber Asset associated with a corresponding High or Medium Impact BES Cyber Systems.
- **Electronic Access Points** – Applies at Electronic Access Points (with External Routable Connectivity or dial-up connectivity) associated with a referenced BES Cyber System.
- **Electronic Access Points with External Routable Connectivity** – Applies at Electronic Access Points with External Routable Connectivity. This excludes those Electronic Access Points with dial-up connectivity.
- **Locally Mounted Hardware or Devices Associated with Defined Physical Boundaries** – Applies to the locally mounted hardware (e.g. such as motion sensors, electronic lock control mechanisms, and badge readers) associated with

a Defined Physical Boundary for High or Medium Impact BES Cyber Systems. These hardware and devices are excluded in the definition of Physical Access Control Systems.

## B. Requirements and Measures

### **Rationale – R1:**

The identification and documentation of the single CIP Senior Manager and any delegations ensures that there is clear authority and ownership for the CIP program within an organization, as called for in Blackout Report Recommendation 43.

In FERC Order 706, paragraph 296, it requests that the SDT consider whether the single senior manager should be a corporate officer or equivalent. The SDT believes that the requirement that the senior manager have “the overall authority and responsibility for leading and managing implementation of the requirements within this set of standards” ensures that the senior manager is of the sufficient position in the responsible entity to ensure that cyber security receives the prominence that is necessary. In addition, given the range of business models for responsible entities, from municipal, cooperative, federal agencies, investor owned utilities, privately owned utilities, and everything in between, the SDT believes that requiring the senior manager to be a “corporate officer or equivalent” would be extremely difficult to interpret and enforce on a consistent

- R1.** Each Responsible Entity shall identify, by name, a CIP Senior Manager. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*
- M1.** Evidence may include, but is not limited to:
- A dated and signed document from a high level official designating the name of the individual identified as the CIP Senior Manager
  - A dated organizational chart designating the name of the individual identified as the CIP Senior Manager.

**Rationale – R2:**

One or more security policies enable effective implementation of the standard's requirements. The purpose of policies is to provide a management and governance

- R2** Each Responsible Entity shall implement one or more documented cyber security policies that represents the Responsible Entity's commitment to the protection of its BES Cyber Systems and addresses the following topics: *[Violation Risk Factor: Medium]*  
*[Time Horizon: Operations Planning]*
- 1.1.** Personnel Security
  - 1.2.** Electronic Security Perimeters
  - 1.3.** Remote Access
  - 1.4.** Physical Security
  - 1.5.** System Security
  - 1.6.** Incident Response
  - 1.7.** Recovery Plans
  - 1.8.** Configuration Change Management
  - 1.9.** Information Protection
  - 1.10.** Provisions for declaring and responding to CIP Exceptional Circumstances
- M2.** Evidence may include, but is not limited to:
- 1. One or more documented cyber security policies, and
  - 2. Records that indicate the required ten topics were implemented.

**Rationale – R3:**

Annual review and approval of the cyber security policy ensures that the policy is kept up-to-date and periodically reaffirms management's commitment to the

- R3.** Each Responsible Entity shall review each of its cyber security policies and obtain the approval of its CIP Senior Manager, initially upon the effective date of the standard and at least once each calendar year thereafter, not to exceed 15 calendar months between reviews and between approvals. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- M3.** Evidence may include, but is not limited to:
1. Revision history, records of review, or workflow evidence from a document management system that indicate annual review of each cyber security policy, and
  2. A dated signature by the CIP Senior Manager for each cyber security policy that indicates annual approval.

**Rationale – R4:**

The intent of the SDT is to ensure that the responsible entity takes sufficient measures to make its cyber security policy available and accessible to personnel. It is not the intent of the SDT for the responsible entity to have the burden of proving that each and every individual can access the document.

- R4.** Each Responsible Entity shall make individuals who have access to BES Cyber Systems aware of elements of its cyber security policies appropriate for their job function. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- M4.** Evidence may include, but is not limited to:
- Policies are accessible on the corporate Intranet site
  - Documented records that policies have been provided to contactors where access to BES Cyber Systems is authorized
  - Policies are posted on company bulletin boards
  - Policies are accessible to individuals with all types of job functions that have access to BES Cyber Systems
  - Dated training records to show that individuals have received periodic training on necessary elements of the cyber security policy

**Rationale – R5:**

In FERC Order 706, paragraphs 379 and 381, the Commission notes that Recommendation 43 of the 2003 Blackout Report calls for “clear lines of authority and ownership for security matters.” With this in mind, the Standard Drafting Team has sought to provide clarity in the requirement for delegations in order that this line of authority is clear and apparent from the documented delegations.

**R5** The CIP Senior Manager shall be responsible for all approvals and authorizations required in the CIP standards. The CIP Senior Manager may delegate the authority for any approvals and authorizations required in the CIP standards with the exception of the approval of the Cyber Security Policy required in CIP-003-5 R3. The authority for subsequent delegations may also be delegated. These delegations shall be documented (by position or name of the delegate), dated, and approved and shall specify the authority that is being delegated. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

**M5.** Evidence may include, but is not limited to:

- A dated document, signed by the CIP Senior Manager listing personnel (by title) who are delegated the authority to approve or authorize specifically identified items (i.e. substation maintenance manager may authorize unescorted physical access to substation control houses), or
- A dated document, signed by the CIP Senior Manager listing individuals who are delegated the authority to approve or authorize specific actions by requirement (i.e., ‘name of individual’ who may approve CIP-002-5 R3), or
- A dated document, signed by the CIP Senior Manager delegating to a named individual the authority for all approvals in CIP-002-5 and CIP-004-5 through CIP-011-1 as well as the authority to approve subsequent delegations; a dated document, signed by the previous named individual delegating to a 3<sup>rd</sup> named individual the authority for all approvals in CIP-004-5 through CIP-011-1 as well as the authority to approve subsequent delegations; and a dated document, signed by the 3<sup>rd</sup> named individual delegating to each of the plant managers (by title) the authority for all approvals and authorizations required in CIP-004-5 through CIP-011-1 for each of the their plants, respectively.

**Rationale – R6:**

The intent of the SDT is to ensure that delegations are kept up-to-date and that individuals do not assume undocumented authority.

- R6.** Changes to the CIP Senior Manager and any delegations shall be documented within thirty calendar days of the change<sup>2</sup>. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
- M6.** Evidence may include, but is not limited to, dated documentation that includes the name of the CIP Senior Manager or documentation that includes the names or positions of any delegations, that is current to within 30 days with the name or position of anyone who performed a required approval or authorization.

**C. Compliance**

**1. Compliance Monitoring Process**

**1.1. Compliance Enforcement Authority**

- Regional Entity.
- If the Responsible Entity works for the Regional Entity, then the Regional Entity will establish an agreement with the ERO or another entity approved by the ERO and FERC (i.e. another Regional Entity) to be responsible for compliance enforcement.
- For Responsible Entities that are also Regional Entities, the ERO or a Regional Entity approved by the ERO and FERC or other applicable governmental authorities shall serve as the Compliance Enforcement Authority.
- For NERC, a third-party monitor without vested interest in the outcome for NERC shall serve as the Compliance Enforcement Authority.

**1.2. Evidence Retention**

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

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<sup>2</sup> Delegations do not need to be reinstated with a change in the CIP Senior Manager position or other position with delegation authority.

Each Responsible Entity shall retain data or evidence for three calendar years or for the duration of any regional or Compliance Enforcement Authority investigation; whichever is longer.

If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the duration specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

**1.3. Compliance Monitoring and Assessment Processes:**

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

**1.4. Additional Compliance Information**

None

**Table of Compliance Elements**

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1</b>	<b>Operations Planning</b>	<b>Medium</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	The Responsible Entity has not identified, by name, a single senior management official (“the CIP Senior Manager”) with overall authority and responsibility for leading and managing implementation of the requirements within the CIP group of standards.
<b>R2</b>	<b>Operations Planning</b>	<b>Medium</b>	<b>N/A</b>	<b>N/A</b>	The Responsible Entity has implemented at least one cyber security policy, but has failed to address one of the required parts 2.1 to 2.10.	The Responsible Entity has not implemented any cyber security policy, Or The Responsible Entity has implemented at least one policy but has failed to address two or more of the required parts 2.1 to 2.10.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R3	Operations Planning	Lower	N/A	N/A	The Responsible Entity has reviewed its cyber security policy or policies, but not all of them have been approved by the CIP Senior Manager within the required time period.	The Responsible Entity has not reviewed the cyber security policy or policies and the CIP Senior Manager has not approved all of them within the required time period.
R4	Operations Planning	Lower	N/A	N/A	The Responsible Entity has made some but not all individuals who have access to BES Cyber Systems aware of elements of the cyber security policies appropriate for their job function.	The Responsible Entity has not made any individuals who have access to BES Cyber Systems aware of elements of the cyber security policies appropriate for their job function.
R5	Operations Planning	Lower	N/A	The Responsible Entity failed to document the approval and authorization of one delegation (by position or name of the delegate) as required.	The Responsible Entity failed to document the approval and authorization of two delegations (by position or name of the delegate) as required.	The Responsible Entity failed to document the approval and authorization of three or more delegations (by position or name of the delegate) as required.

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R6	Operations Planning	Lower	N/A	NA	Change to one delegation was not documented within 30 calendar days of the effective date.	A change to the CIP Senior Manager, Or more than one delegation was not documented within 30 calendar days of the effective date.

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

## Guidelines and Technical Basis

### Requirement R2:

The number of policies and their specific language would be guided by a Responsible Entity's management structure and operating conditions. Policies might be included as part of a general information security program for the entire organization, or as components of specific programs. The cyber security policy must cover in sufficient detail the ten topical areas required by CIP-003-5 R2. The Responsible Entity has the flexibility to develop a single comprehensive cyber security policy covering these topics or may choose to develop a single high-level umbrella policy and provide additional policy detail in lower level documents in its documentation hierarchy. In this case of a high-level umbrella policy, it would be expected that the entity provide the high-level policy as well as the additional documentation in order to prove compliance with CIP-003-5 R2. The Responsible Entity should consider the following for each of the required topics in its cyber security policy:

#### 2.1 Personnel Security

- Organization position on acceptable background investigations
- Identification of possible disciplinary action for violating this policy
- Account Management

#### 2.2 Electronic Security Perimeters

- Organization stance on use of wireless networks
- Identification of acceptable authentication methods
- Identification of trusted and untrusted resources
- Monitoring and logging of ingress and egress at Electronic Access Points

#### 2.3. Remote Access

- Maintaining up-to-date anti-malware software before initiating interactive remote access
- Maintaining up-to-date patch levels for operating system and applications used to initiate the interactive remote access before initiating interactive remote access
- Disabling VPN “split-tunneling” or “dual-homed” workstations before initiating interactive remote access
- For vendors, contractors, or consultants: include language in contracts that requires adherence to the Responsible Entity’s interactive remote access controls

#### 2.4 Physical Security

- Strategy for protecting cyber assets from unauthorized physical access
- Acceptable physical access control methods
- Monitoring and logging of physical ingress and egress

### 2.5 System Security

- Strategies for system hardening
- Acceptable methods of authentication and access control
- Password policies including length, complexity, enforcement, prevention of brute force attempts
- Monitoring and logging of BES Cyber Systems

### 2.6 Incident Response

- Recognition of Cyber Security Incidents
- Appropriate notifications upon discovery of an incident
- Obligations to report Cyber Security Incidents

### 2.7 Recovery Plans

- Availability of spare components
- Availability of system backups

### 2.8 Configuration Change Management

- Initiation of change requests
- Approval of changes
- Break-fix processes

### 2.9 Information Protection

- Information access control methods
- Notification of unauthorized information disclosure
- Information access on a need-to-know basis

### 2.10 Provisions for CIP Exceptional Circumstances

- Processes to invoke special procedures in the event of a CIP Exceptional Circumstance
- Processes to allow for exceptions to policy that do not violate CIP requirements

The SDT has removed requirements relating to exceptions to Responsible Entity's security policies since it considers this a general management issue that is not within the scope of a compliance requirement. The SDT considers this an internal policy requirement and not a reliability requirement. However, the SDT encourages Responsible Entities to continue this practice as a component of its cyber security policy

#### **Requirement R3:**

In this and all subsequent required approvals in the NERC CIP Standards, the Responsible Entity may elect to use hardcopy or electronic approvals to the extent that there is sufficient evidence to ensure the authenticity of the approving party.

**Requirement R5:**

As indicated in the rationale for CIP-003-5 R5, this requirement is intended to demonstrate a clear line of authority and ownership for security matters. The intent of the Standard Drafting Team was not to impose any particular organizational structure, but rather the Responsible Entity should have significant flexibility to adapt this requirement to their existing organizational structure. As detailed in the examples provided in the Measure, this requirement may be met through a single delegation document or through multiple delegation documents. The Responsible Entity can make use of the delegation of the delegation authority itself to increase the flexibility in how this applies to their organization. In such a case, delegations may exist in numerous documentation records as long as the collection of these documentation records provides a clear line of authority back to the CIP Senior Manager. In addition, the CIP Senior Manager could also choose not to delegate any authority and meet this requirement without such delegation documentation.