Maintenance Implementation Checklist

Policy and Documentation

- [ ] **MA-1**: Develop comprehensive maintenance policy at organization-level, mission/business process-level, or system-level
- [ ] **MA-1**: Ensure maintenance policy addresses purpose, scope, roles, responsibilities, management commitment, coordination, and compliance
- [ ] **MA-1**: Verify maintenance policy is consistent with applicable laws, executive orders, directives, regulations, policies, standards, and guidelines
- [ ] **MA-1**: Document procedures to facilitate implementation of the maintenance policy and associated controls
- [ ] **MA-1**: Designate an official to manage development, documentation, and dissemination of maintenance policy and procedures
- [ ] **MA-1**: Disseminate maintenance policy and procedures to organization-defined personnel or roles
- [ ] **MA-1**: Review and update maintenance policy at least every 3 years and following significant changes
- [ ] **MA-1**: Review and update maintenance procedures at least annually and following significant changes

Controlled Maintenance

- [ ] **MA-2**: Schedule maintenance, repair, and replacement activities according to manufacturer/vendor specifications and organizational requirements
- [ ] **MA-2**: Document all maintenance, repair, and replacement activities on system components
- [ ] **MA-2**: Review maintenance records regularly to ensure compliance
- [ ] **MA-2**: Approve all maintenance activities before they are performed (on-site or remote)
- [ ] **MA-2**: Monitor all maintenance activities whether performed on-site or remotely
- [ ] **MA-2**: Establish explicit approval process for removal of systems or components from organizational facilities
- [ ] **MA-2**: Define specific personnel or roles authorized to approve off-site maintenance

☐ **MA-2**: Identify types of information that must be sanitized from equipment before off-site maintenance

☐ **MA-2**: Sanitize equipment to remove sensitive information before off-site maintenance, repair, or replacement

☐ **MA-2**: Verify all potentially impacted security controls are functioning properly after maintenance activities

☐ **MA-2**: Define specific information to be included in maintenance records

☐ **MA-2**: Maintain comprehensive maintenance records with organization-defined information

Maintenance Tools

☐ **MA-3**: Establish approval process for system maintenance tools

☐ **MA-3**: Control and restrict access to approved maintenance tools

☐ **MA-3**: Monitor the use of all system maintenance tools

☐ **MA-3**: Review previously approved maintenance tools at least annually

☐ **MA-3 (1)**: Inspect maintenance tools used by personnel for improper modifications

☐ **MA-3 (1)**: Inspect maintenance tools used by personnel for unauthorized modifications

☐ **MA-3 (2)**: Check diagnostic and test program media for malicious code before use in the system

☐ **MA-3 (2)**: Establish procedure for malware scanning of maintenance media

☐ **MA-3 (3)**: Implement controls to prevent unauthorized removal of maintenance equipment containing organizational information

☐ **MA-3 (3)**: Verify maintenance equipment contains no organizational information before removal from facility

☐ **MA-3 (3)**: Sanitize or destroy maintenance equipment that cannot be cleared of organizational information

☐ **MA-3 (3)**: Retain maintenance equipment within facility when it contains organizational information

☐ **MA-3 (3)**: Establish exemption process requiring information owner authorization for equipment removal

Nonlocal Maintenance

- ☐ **MA-4**: Establish approval process for nonlocal (remote) maintenance and diagnostic activities
- ☐ **MA-4**: Monitor all nonlocal maintenance and diagnostic activities
- ☐ **MA-4**: Document organizational policy for use of nonlocal maintenance tools
- ☐ **MA-4**: Document nonlocal maintenance requirements in system security plan
- ☐ **MA-4**: Implement strong authentication for nonlocal maintenance sessions
- ☐ **MA-4**: Maintain detailed records of all nonlocal maintenance and diagnostic activities
- ☐ **MA-4**: Terminate sessions and network connections immediately upon completion of nonlocal maintenance

Maintenance Personnel

- ☐ **MA-5**: Establish formal process for authorizing maintenance personnel
- ☐ **MA-5**: Maintain current list of authorized maintenance organizations
- ☐ **MA-5**: Maintain current list of authorized maintenance personnel
- ☐ **MA-5**: Verify non-escorted maintenance personnel possess required access authorizations
- ☐ **MA-5**: Designate organizational personnel with appropriate clearances to supervise maintenance activities
- ☐ **MA-5**: Ensure supervisory personnel have required access authorizations
- ☐ **MA-5**: Ensure supervisory personnel have technical competence to oversee maintenance work

Timely Maintenance

- ☐ **MA-6**: Identify critical system components requiring maintenance support
- ☐ **MA-6**: Define acceptable time periods for obtaining maintenance support after component failure
- ☐ **MA-6**: Establish agreements or contracts for timely maintenance support
- ☐ **MA-6**: Establish agreements or contracts for spare parts procurement
- ☐ **MA-6**: Ensure maintenance support can be obtained within defined timeframes

FedRAMP Moderate Templates

Key Timeframes Summary

- ☐ **Policy review:** At least every 3 years and following significant changes
- ☐ **Procedure review:** At least annually and following significant changes
- ☐ **Maintenance tool review:** At least annually