ENGINEERING AND CONSTRUCTION BULLETIN

US Army Corps of Engineers

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SUBJECT: Cybersecurity Requirements for Design and Construction of Control Systems and Integrated Low Voltage Systems for Permanent and Non-permanent Construction

CATEGORY: Directive and Guidance

1. **References**:

a. Unified Facilities Criteria (UFC) 4-010-06, Cybersecurity of Facility-Related Control Systems, 10 October 2023

b. Unified Facilities Guide Specification (UFGS) 25 05 11, Cybersecurity for Facility-Related Control Systems, 1 August 2024

c. DoD Instruction (DoDI) 8510.01, Risk Management Framework for DoD Systems, 19 July 2022

d. Engineering Regulation (ER) 25-1-113, USACE Critical Infrastructure Mandatory Center of Expertise (UCIC-MCX), 31 January 2019

2. **Purpose.** This ECB provides direction and guidance for the mandate to use UFC 4-010-06 and UFGS 25 05 11 for all Civil Works (CW) control systems designed or constructed by USACE, including those for external project sponsors. It was originally published as ECB 2022-2 on 7 Jan 2022 and as Rev 1 on 20 Sep 2023. This ECB also clarifies USACE's design and construction roles and responsibilities related to control system cybersecurity.

3. **Applicability.** This ECB applies to all Civil Works control systems designed or constructed by USACE for permanent or non-permanent facilities regardless of project type and funding source. This ECB also applies to all low-voltage systems which are designed or constructed by USACE for permanent or non-permanent facilities, and integrate with control systems, regardless of project type and funding source for both permanent and non-permanent facilities.

4. **Background.**

a. The DoD requires applying the Risk Management Framework (RMF) to all control systems. Using a risk-based approach, the RMF process allows System Owners (in coordination with the Authorizing Official) to tailor cybersecurity requirements to meet mission and functional requirements.

b. UFC 4-010-06 defines the design process for incorporating cybersecurity into the control system design in support of the RMF process. This design process is universal for all control systems and includes the identification of cybersecurity requirements to incorporate into the design in coordination with the System Owner. The UFC also defines required design

submittals, coordinated with the System Owner, to ensure that the design is meeting the owner's requirements.

c. USACE needs to clarify the required use of UFC 4-010-06 when designing Civil Works control systems and how the UFC aligns with the established Civil Works Operational Technology Cybersecurity Program.

d. There are instances where USACE is constructing a non-FRCS control system (e.g. a manufacturing system), or a low-voltage system which will be integrated with a control system (e.g. Nurse Call System). The process defined by UFC 4-010-06 for inclusion of cybersecurity in the design will apply to these systems, and the overall UGS 25 05 11 specification structure, requirements, and deliverables will largely be applicable as well.

e. Cybersecurity requirements apply to control systems for both permanent and non-permanent facilities.

5. **Directive.**

a. USACE Engineering and Construction (E&C) is responsible for including cybersecurity requirements into the design of control systems in accordance with UFC 4-010-06 and System Owner requirements. USACE E&C is also responsible for the construction of systems in accordance with the design and the testing required to demonstrate compliance with the design. All other aspects of the RMF process remain the responsibility of the System Owner.

b. Pursuant to ER 25-1-113 (reference d), the USACE Critical Infrastructure Cybersecurity Mandatory Center of Expertise (UCIC MCX) provides cybersecurity design requirements for all System Owners of Civil Works and USACE-owned and operated control systems and performs cybersecurity design reviews for those systems. The PDT must engage the MCX during the preliminary design and throughout the design process as required in the ER. UCIC-MCX actively collaborates with E&C regarding control system cybersecurity criteria.

c. The System Owner is responsible for developing RMF artifacts (e.g. System Security Plan, Incident Response Plan) that are beyond the project submittals defined in UFC 4-010-06. The System Owner is also responsible for fulfilling all additional requirements necessary for obtaining an RMF Authorization to Operate (ATO). Pursuant to reference d, the UCIC provides direction and guidance for all RMF requirements, including RMF implementation processes and required RMF artifacts and documentation, for all System Owners of Civil Works and USACE owned and operated control systems.

d. All control systems, and other low-voltage systems integrated with control systems, designed and constructed by USACE for permanent and non-permanent facilities for Civil Works will be designed in accordance with UFC 4-010-06 and cybersecurity requirements provided by the System Owner.

e. All control systems, and other low-voltage systems integrated with control systems, designed and constructed by USACE for permanent and non-permanent facilities for Civil Works infrastructure will use UFGS 25 05 11 as the starting guide specification for

cybersecurity. The UFGS must be edited to generate a project specification according to specific mission requirements. As of August 2024, UFGS 25 05 11 includes a Civil Works tailoring option providing specific requirements for USACE owned and operated or USACE designed and/or constructed projects.

f. New project designs starting after 7 January 2022 must follow the UFC. For this requirement, contracted designs start at Request for Proposal (RFP) issuance.

g. Projects including Building Control Systems (e.g. HVAC, lighting), Fire Protection Systems, or Electronic Security Systems must use UFGS 25 05 11 to prepare project specifications for those systems.

h. For control systems not identified in 5.g, such as Supervisory Control and Data Acquisition or Programmable Logic Controllers, use UFGS 25 05 11 and implement the CW tailoring option to prepare project specifications for those systems.

i. Users of the UFC and UFGS who identify errors in or enhancements to the documents are encouraged to submit Criteria Change Requests via the document page on the Whole Building Design Guide website (https://www.wbdg.org/) or using the CCR submission page for the document:

- UFC 4-010-06: http://cms.wbdg.org/ccrs/new?ufc=4-010-06
- UFGS 25 05 11: http://cms.wbdg.org/ccrs/new?ufgs=25%2010%2010

6. **Point of Contact.** HQUSACE point of contact for this ECB is Shane Nieukirk, CEEC, 202-761-0522, shane.m.nieukirk@uace.army.mil.

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