Managing Self-Reports/Self-Logs and Mitigations

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Background

There have been some inquiries from Registered Entities regarding the process around the creation, management, and submission of Self-Reports/Self-Logs and Mitigations. The following information is being provided to assist Registered Entities in better understanding the Align processes around these activities to ensure they are properly received by the Compliance Enforcement Authority (CEA) in a timely manner.

Registered Entities are encouraged to work with their Region's CEA single points of contact (SPOCs) as they navigate Align with the guidance provided below to ensure appropriate actions are taken.

Reminder for Registered Entity to submit Draft Records to CEA

The Align system allows Registered Entities to create, manage, and submit Self-Reports/Self-Logs and Mitigations to the Compliance Enforcement Authority (CEA). When a Registered Entity first creates the Self-Report/Self-Log and Mitigation records, these always start off as a Draft record. Once the Registered Entity is satisfied with the content in the Self-Report/Self-Log and Mitigation record, the Registered Entity needs to Submit the record to the CEA. We are providing some helpful reminders for Registered Entities on how to manage these records for submission to the CEA. It is important to note that if a Registered Entity does not "Submit" the record to the CEA, it will remain in a Draft state with the Registered Entity.

NERC encourages all Registered Entities to login to Align to confirm whether there are any Draft Self-Report/Logs or Mitigation Records sitting in the Registered Entities portlets that need to be submitted to the CEA, deleted, or revised by the Registered Entity.

Submitting Draft Self-Report/Self-Log

Once a Registered Entity logs into Align, to create a Self-Report/Self-Log, it will need to navigate to the "Self-Reports and Logs" module.[1] Once the Self-Report/Self-Log has been created, the Registered Entity will only have the option to "Save" this record. To view all Draft Self-Report/Self-Log records, the Registered Entity will need to navigate to the "My Drafts" portlet located at the bottom of the page on the "Self-Reports and Logs" module and click the refresh button with that portlet or refresh the browser to see the Draft Self-Report/Self-Log record in the "My Drafts" portlet.

The Registered Entity can view the Draft Self-Report/Self-Log by clicking on the Unique ID of the record you want to access by clicking on the hyperlink under the "Unique ID" column. To submit the Self-Report/Self-Log to the CEA, the Registered Entity will need to scroll down to the "Action" section on the form. In this

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[1] Training videos and guides are posted on the NERC Training website. The video for creating and submitting a finding can be viewed in the "4) Creating a Self-Report or Self-Log" video. The Registered Entity user guide explains the process in Chapter 4 "Creating a Finding".

"Action" section, there is a dropdown field "Action" with the following three options: No Action, Delete, Submit. Only "Delete" and "Submit" are actionable options that have to be selected along with clicking on the "Save and Action" button. As a reminder, "Save" only saves the work that has been completed on the form to allow you to work on it at a later date, "Save and Action" will action the record to the next workflow step.

Delete

If the Registered Entity determines that the Draft Self-Report/Self-Log record is no longer relevant, it has the ability to "Delete" the Draft record. If the Draft record is "Deleted" this record will be removed from the "My Drafts" portlet and will not be submitted to the CEA for processing. To "Delete" the record, the Action needs to be set to "Delete" and then the Registered Entity should select the "Save and Action" button.

Main Steps to Delete Self-Report/Self-Log
- Select *Self Reports and Logs* module from the navigation dropdown.
- Click on the unique ID of the Self-Report/Self-Log you would like to submit from the "My Drafts" list.
- Select "Delete" from the Action dropdown.
- Click the "Save and Action" button to delete the draft and remove it from the My Drafts list.

Submit

If the Registered Entity determines that the Draft Self-Report/Self-Log record is ready for submission to the CEA, it has to select the "Submit" in the "Action" dropdown and then click on the "Save and Action" button.

Main Steps to Submitting Self-Report/Self-Log
- Select *Self Reports and Logs* module from the navigation dropdown.
- Click on the unique ID of the Self-Report/Self-Log you would like to submit from the "My Drafts" list.
- Select "Submit" from the Action dropdown.
  - Use the checkbox if you have completed Mitigation milestones for CEA to review. If the mitigation record is not yet ready to submit, you can submit Mitigation later from the My

Draft Mitigations tab under *Mitigation Management* module (*see* "Submitting Mitigation from the Draft Mitigation Portlet" section below).

- Click the "Save and Action" button to submit the Self-Report/Self-Log to your CEA.

Submitting Mitigation from the Self-Report/Self-Log Record

Prior to submitting the Self-Report/Self-Log record, the Registered Entity should consider whether it is ready to submit the Mitigation milestones for this record to the CEA for review. The Registered Entity has the ability to document all its milestones for the record under the "Mitigation Information (optional – click to expand" section on the Self-Report/Self-Log form. The Registered Entity should only consider submitting the Mitigation record at the same time as the Self-Report/Self-Log record if it is sure that the milestones are fully documented. If the Registered Entity is satisfied with the Mitigation milestones, the Registered Entity would also want to click on the box next to "Submit Mitigations for Review with Findings?" checkbox, set the Action to "Submit" and then click on the "Save and Action" button on the form. If the checkbox is selected, the Self-Report/Self-Log record and the Mitigation record are both submitted to the CEA for review. If the Registered Entity does not select the checkbox (step 3 below), the Registered Entity will need to remember to go to the "Mitigation Management" module later to submit the Mitigation record to the CEA for review.

Submitting Mitigation from the Draft Mitigation Portlet

If the Registered Entity is not ready to submit the Mitigation milestones along with the Self-Report/Self-Log, the Registered Entity has the ability to submit Mitigations separately from the "Mitigation Management" module. To do this, the Registered Entity can navigate to the "Mitigation Management" module and view all the Mitigation records that are in the Draft state with the Registered Entity under the "My Draft Mitigations" tab. The Mitigation records will include all new Draft Mitigation records as well as any Mitigation record that was returned to the Registered Entity for revision by the CEA.

The Registered Entity is encouraged to review the Mitigation records in the "My Draft Mitigations" tab to see if any Mitigation records should be submitted to the CEA for Review. To submit for CEA review, the Registered Entity will select the Mitigation record by clicking on the hyperlink under the "Unique ID"

column. Once the record is open the Registered Entity can scroll down to the bottom of the form and in the "Action" dropdown select the "Submit for CEA Review" and then click on the "Save and Action" button.

Reminder for Registered Entity to submit Completed Mitigation records to CEA for Verification

As a reminder, the Mitigation record does not automatically get submitted to the CEA for Verification, the Registered Entity must take action to submit it. The Registered Entity is encouraged to check the Mitigation records under the "My Active Mitigations" tab and sort the status of "Active" to see if there are any Mitigation records that can be submitted to the CEA for Verification review.

Submitting Completed Mitigation to the CEA for Verification

In order to submit the Mitigation record for Verification review, all milestones must have entity completion dates and the Mitigation record needs to be in the "Active" status. To submit the Mitigation record for Verification review, scroll down to the bottom of the form and in the "Action" dropdown select "Submit for CEA Verification" and then click on the "Save and Action" button.