

June
2025

PLAN OF ACTION AND MILESTONES (POA&M)

JOB AID



CDSE Center for Development
of Security Excellence

USING THIS JOB AID

This job aid is a tool to help information system security professionals understand how to create and use the Plan of Action and Milestones (POA&M).

OVERVIEW OF POA&M

This section provides a general overview of the POA&M:

- Purpose of the POA&M
- When a POA&M is required
- Who prepares/uses a POA&M and how
- How to create/update a POA&M

Purpose of the POA&M

The purpose of the POA&M is to assist organizations in identifying, assessing, prioritizing, and monitoring the progress of corrective efforts for security weaknesses, deficiencies, or vulnerabilities found in programs and systems.

The POA&M:

- Facilitates a disciplined and structured approach to mitigating risks in accordance with the priorities of the Information System Owner (ISO)
- Includes the findings and recommendations of the security assessment report and continual security assessments
- Is maintained throughout the system life cycle

When a POA&M is Required

The POA&M is created as part of Step 6 (Authorize System) in the 7-step Risk Management Framework (RMF) process and when common controls have been determined, through independent assessments, to be less than effective. The POA&M is maintained as part of the Security Authorization Package (formerly known as the Certification and Accreditation, or C&A, package).

Who Prepares/Uses the POA&M and How

- The ISO or the project manager/system manager (PM/SM) lists the following in the POA&M:
 - Non-compliant (NC) security controls
 - Security controls that are not applicable (N/A)
 - Remediation or mitigation tasks for non-compliant security controls
 - Required resources
 - Milestones and completion dates
 - Inherited vulnerabilities



- The ISO or PM/SM initiates the corrective actions identified in the POA&M
- With the support and assistance of the information system security manager (ISSM), the ISO or PM/SM provides visibility and status of the POA&M to the:
 - Authorizing official (AO)
 - Senior information security officer (SISO)
- The DOD Component SISOs monitor and track the overall execution of system-level POA&Ms across the entire Component until identified security vulnerabilities have been remediated and the RMF documentation (Security Authorization Package) is appropriately adjusted



How To Create/Update a POA&M

- [Download and open the POA&M template.](#)
- Follow the instructions in the next section to complete the POA&M.

Plan of Action and Milestones (POA&M)												
System Name DoD Network			Date of this POA&M 10/1/2016			SAMPLE POA&M FOR TRAINING PURPOSES ONLY						
Company/ Organization Name CDSE			Date of last update 2/15/2016									
Sponsoring Service/Agency Defense Security Service			Date of original POA&M 10/1/2015									
ISSM Name John Doe			IS Type Enclave									
ISSM Phone 410-xxx-xxxx			UID 009-1111-2222									
ISSM Email Address john.doe1000.cv@mail.mil												
Item Identifier	Weakness or Deficiency	Security Control	POC	Resources Required	Scheduled Completion Date	Milestones with Completion Dates	Changes to Milestones	Weakness/ Deficiency Identified by	Risk Level (Low/Med/High)	Estimated Cost	Status	Comments
FY15_001	Users are able to connect remotely	AC-17	John Doe	Network Administrator	3/15/2016	Disable remote access 3/15/16	N/A	Annual Audit	Medium	500.00	Completed	

Information Required To Be in the POA&M

This section describes the information required in each column on the POA&M. Refer to the sample POA&M above as you review each of these items.

Column Header	Description	What You Should Do
<i>Item Identifier</i>	A unique weakness identifier used to track and correlate weaknesses that are ongoing throughout quarterly submissions within the organization.	<ul style="list-style-type: none"> ▪ Use the numbering schema that has been determined by your organization.
<i>Weakness or Deficiency</i>	Represents any program or system-level information security vulnerability that poses an unacceptable risk of compromising confidentiality, integrity, or availability of information.	<ul style="list-style-type: none"> ▪ Describe weakness or deficiency identified by certification/validation testing, annual program review, Inspector General (IG) independent evaluation, or any other work done by or on behalf of the organization. ▪ Sensitive descriptions are not necessary, but provide sufficient detail to permit oversight and tracking.

Column Header	Description	What You Should Do
<i>Security Control</i>	The Security Controls are listed in the NIST SP 800-53 and directly relate to the weakness identified in 'Weakness or Deficiency' column.	<ul style="list-style-type: none"> ▪ Enter security control that correlates to the weakness or deficiency. ▪ For a security weakness found by means other than a security controls assessment (e.g., vulnerability test), map the deficient function into the applicable security control.
<i>Point of Contact (POC)</i>	The organization or title of the position within the organization that is responsible for mitigating the weakness.	<ul style="list-style-type: none"> ▪ Enter the name, title, and organization of the assigned responsible individual(s).
<i>Resources Required</i>	Estimated funding and/or manpower resources required for mitigating a weakness.	<ul style="list-style-type: none"> ▪ Note the source and type of funding (current, new, or reallocated) and any funding obstacles. ▪ Include the total funding requirements in the Security Costs column.
<i>Scheduled Completion Date</i>	Completion date based on a realistic estimate of the amount of time it will take to procure/allocate the resources required for the corrective action and implement/test the corrective action.	<ul style="list-style-type: none"> ▪ Always enter either the estimated completion date or 'N/A' if the risk is accepted. <ul style="list-style-type: none"> • Never change this date. • If a security weakness is resolved before or after the originally scheduled completion date, put the actual completion date in the Status field.
<i>Milestones With Completion Date</i>	Specific high-level steps to be executed in mitigating the weakness and the estimated completion date for each step.	<ul style="list-style-type: none"> ▪ List the specific high-level steps to be executed in mitigating the weakness and the estimated completion date for each step. <ul style="list-style-type: none"> • Enter changes to milestones and completion dates in the Changes to Milestones column.
<i>Changes to Milestones</i>	New estimated completion date for a milestone and the reason for the change.	<ul style="list-style-type: none"> ▪ Indicate the new estimated date for a milestone's completion, if the original date is not met. ▪ Include the reason for the change.
<i>Weakness of Deficiency Identified By</i>	The source of the weakness, the reviewing agency/organization, and the date that the weakness was identified.	<ul style="list-style-type: none"> ▪ Enter the source of the weakness, for example: <ul style="list-style-type: none"> • Security controls assessment • Penetration test • IG audit • Certification testing ▪ Enter the reviewing agency/organization and the date that the weakness was identified.

Column Header	Description	What You Should Do
<i>Status</i>	The stage or state of the weakness in the corrective process cycle.	<ul style="list-style-type: none"> ▪ Enter one of these stages or states of the weakness in the corrective process cycle: <ul style="list-style-type: none"> • Completed—when a weakness has been fully resolved and the corrective action has been tested; include date of completion. • Ongoing—when a deficiency/weakness is in the process of being mitigated and it has not yet exceeded the original scheduled completion date. • Delayed—when a deficiency/weakness continues to be mitigated after the original scheduled completion date has passed. • Planned—when corrective actions are planned to mitigate the deficiency/weakness, but the actions have not yet been applied/implemented. • Accepted—when AO decides to accept the risk. <ul style="list-style-type: none"> - Include the date AO decided to accept the risk of an identified weakness (after AO received a recommendation from the PM office along with a “Mitigation Strategy Report” addressing all implemented/ inherited countermeasures and mitigating factors). - Periodically review solutions to address the risk to eventually close out the finding when possible.
<i>Comments</i>	Any amplifying or explanatory remarks that will assist in understanding other entries relative to the identified weakness(es).	<ul style="list-style-type: none"> ▪ Include any amplifying or explanatory remarks that will assist in understanding other entries relative to the identified weakness(es), such as: <ul style="list-style-type: none"> • Mitigating factors that will lessen the risks to the system and the network. • Recommendations to downgrade a finding based on implemented/inherited mitigations. • Explanation for a delay or change in a Milestone or Scheduled Completion Date. • Identification of other obstacles or challenges (non-funding-related) to resolving the weakness (i.e., lack of personnel or expertise, developing new system to replace insecure legacy system).

Column Header	Description	What You Should Do
<i>Risk Level</i>	A ranking that determines the impact of a vulnerability, if exploited, to the system, data, and/or program.	<ul style="list-style-type: none"> ▪ Enter the risk level of the weakness or deficiency: <ul style="list-style-type: none"> • High • Medium • Low
<i>Estimated Cost</i>	The total estimated cost of correcting the weakness or deficiency.	<ul style="list-style-type: none"> ▪ Enter the total estimated cost by adding up the individual estimated costs of correcting each weakness or deficiency.

