Cybersecurity Resiliency for Defense Contractors Webinar Series:
Cybersecurity Compliance – Real Company Examples

October 29, 2020
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Today's Topics

- How to write policies and procedures – and how are they different?
- What to do and what not to do when working towards compliance
- Examples from manufacturers of what works – and what does not

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Service-Disabled Veteran Owned Small Business (SDVOSB)

Areas of Focus:

Cybersecurity Training

Penetration Testing

Vulnerability Assessments

CISO-as-a-Service

Cybersecurity Strategy

DFARS 252.204-7012 & CMMC

Based in Greater St. Louis Area

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What are policies and procedures – and how are they different?

Policies are guidelines or rules that cover **what** an organization expects from employees, and **why**. Policies cover any laws or regulations that apply to your organization and try to ensure compliance with those requirements. **Effective policies set the tone for a healthy work culture.**

Procedures provide step-by-step instructions for specific routine tasks, and to explain **how** things are done. They may include a checklist or process steps for your employees to follow. **Effective procedures ensure that employees know what to do and keep your organization running smoothly.**

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How to write policies– The Do List

- Use clear, concise, and simple language
- Explain the rule, not how to implement the rule **(what)**
- Always make it easily accessible to staff
- Cite applicable rules, regulations, or laws and the penalties for non-compliance **(why)**
- **Review at least annually! (document review details)**

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How to write policies– The Don't List

- Avoid mixing procedures with policies. Unless a law changes and organization's policy should not require a lot of changes policies (procedures can change frequently)
- Don't use individual's names in the policy, unless you must list out a current team/group like CIRT (Use position titles instead)
- Don't forget to state in each policy that violations of the policy (compliance is not optional)

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How to write procedures – The Do List

- Use clear, concise, and simple language
- Address **how** to implement policies
- Always take user experience into account (never make assumptions)
- Include all steps, from start to finish
- Make sure that everyone who does a specific task has access to the procedures for that task
- **Review at least annually! (document review details)**

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How to write procedures – The Don't List

- Don't be unnecessarily restrictive or complicated
- Don't skip steps
- Don't forget to determine who is responsible for reviewing, approving, and implementing the procedure (responsible for updates too!)
- Procedures constantly evolve over time, don't forget to document and track version changes!

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Common policy examples

- Acceptable Use Policy
- Clean Desk Policy
- Email Policy
- Password Protection Policy
- Social Engineering/Security Awareness Policy

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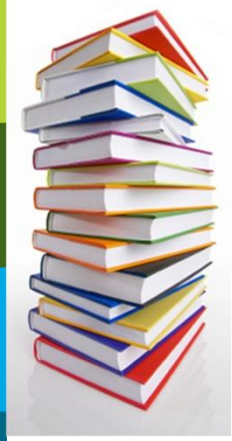
NIST 800-171 policies you need



- Access control policy
- Auditing, monitoring, logging, & reporting policy
- Configuration management policy
- Identification and authentication policy
- Incident response policy
- Media protection and disposal policy
- Personnel security policy
- Physical security policy
- Security awareness training policy
- System and communications protection policy
- System and information integrity policy
- System maintenance policy
- Risk management policy
- Security assessment and authorization policy

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Common procedure examples

- Business Continuity Plan (BCP)
- Disaster Recovery Plan (DRP)
- Incident Response Plan (IRP)
- Standard Operating Procedures (SOP)

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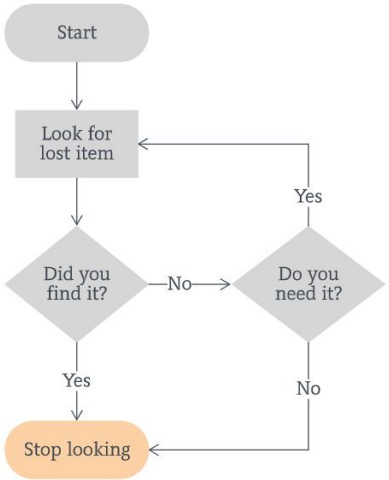
Workflow diagram example



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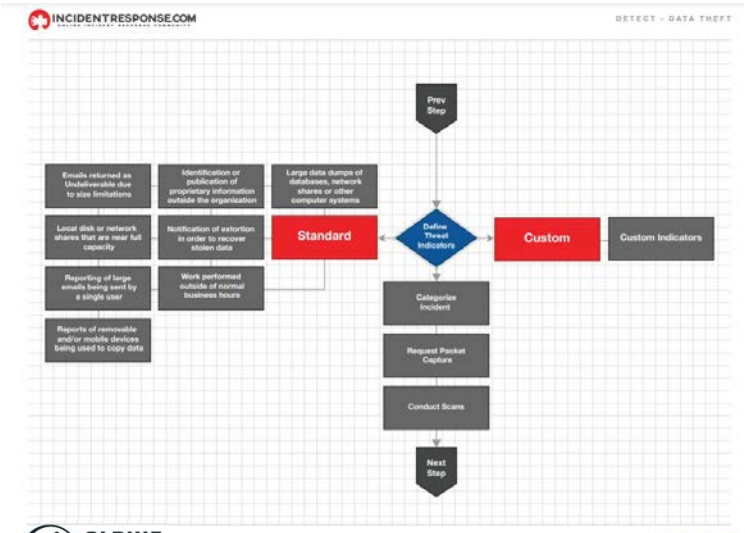
IRP playbook page example



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NIST 800-171 procedures you need

- Access control procedures
- Auditing, monitoring, logging, & reporting procedures
- Configuration management procedures
- Identification and authentication procedures
- Incident response procedures (IRP)
- Media protection and disposal procedures
- Personnel security procedures
- Physical security procedures
- Security awareness training procedures
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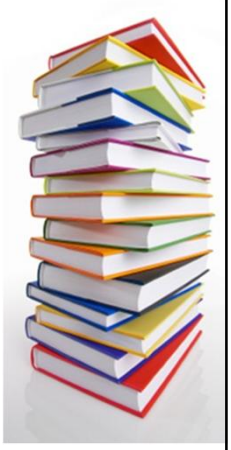
- System maintenance procedures
- Risk management procedures
- Security assessment and authorization procedures



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Compliance 101

The term compliance describes the ability to act according to an order, set of rules, or request.

- Business compliance operates at two levels:
  - *Level 1 - compliance with the external rules that are imposed upon an organization as a whole*
  - *Level 2 - compliance with internal systems of control that are imposed to achieve compliance with the externally imposed rules*

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Compliance vs. Security

Compliance	Security
Compliance means ensuring an organization meets the minimum requirements of the policies, regulations, and laws that apply to that organization	Security is a clear set of technical systems, tools, and processes put in place to protect and defend the information, personnel, and technology assets of an organization

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Why companies should have GRC

GRC (governance, risk, and compliance) — is an umbrella term for the processes and practices that organizations implement to meet business objectives

- *Helps with monitoring and mitigating risks*
- *Helps track regulatory changes and verifies compliance*
- *Aligns policies and processes to organizational goals*

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GRC resource example - TiGRIS

TalaTek Intelligent Governance and Risk Integrated Solution (TiGRIS)

The Only FedRAMP-Authorized GRC

Simplify GRC with the TalaTek intelligent Governance and Risk Integrated Solution (TiGRIS) managed service. TiGRIS combines our client-tested SaaS solution with our proven methodology and GRC experts in a single integrated offering. The result is a governance, risk, and compliance program that delivers the comprehensive visibility and control you need to make better informed risk decisions with far less investment than traditional technology-only approaches.

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What to do and what not to do when working towards compliance

- Start with a plan, and then get started!
- Communicate the plan and the progress often
- Focus on continuous improvement
- Set goals and milestones
- Enforce accountability
- Don't forget to explain the "why"
- Don't forget to double check (or triple check) your work

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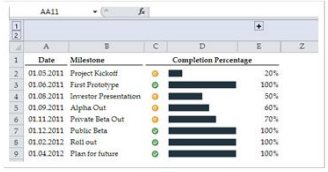
Make a checklist – Keep it updated!

Use a checklist to keep track of tasks that need to be done, policies and procedures that need to be written, and any processes that need to be developed

- *Use a GANTT style chart with milestones to stay on track*
- *Don't forget about training personnel on new policies, procedures, and practices!*



	Date	Milestone	Completion Percentage
2	01.05.2011	Project Kickoff	20%
3	01.06.2011	First Prototype	100%
4	01.08.2011	Investor Presentation	50%
5	01.09.2011	Alpha Out	60%
6	01.11.2011	Private Beta Out	70%
7	01.12.2011	Public Beta	100%
8	01.02.2012	Roll out	100%
9	01.04.2012	Plan for future	100%

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Have a change management process

- Define the change
- Select the change management team
- Identify management sponsorship and secure commitment
- Develop implementation plan including metrics
- Implement the change—in stages, if possible
- Collect and analyze data
- Quantify gaps and understand resistance
- Modify the plan as needed and loop back to the implementation step

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Make policies accessible to everyone

Your employees should not have to go through dangers untold and hardships unnumbered just to find your policies.

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Provide training for procedures

- Focus on both the how and the why within the procedures
- Explain expectations from a high level, gradually moving to a personal level for the greatest context
- Don't rush the learning process, check often for understanding
- Incorporate hands-on learning as soon as possible
- Develop a training plan and regularly review to identify areas for improvement

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Check often for understanding

- Don’t assume employees have read or understood your policies, even if they sign off on it!
- The writer’s intention and the reader’s interpretation of a policy may be different
- Ensure knowledge is **current** for existing and/or updated policies
- Have employees show you where a specific policy is located. If they cannot, your policies are not accessible enough

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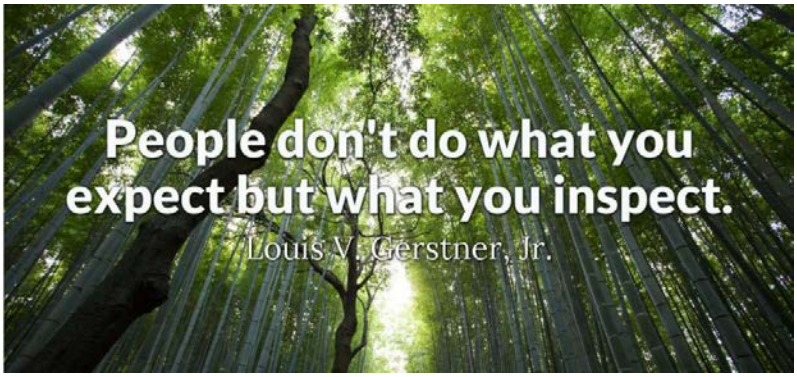
Enforce compliance



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Examples from manufacturers of what works – and what does not

What works

- Plan to execute, then execute the plan
- Be prepared for challenges
- Focus on the end goal
- Have accountability buddies (battle buddy)

What does not work

- Delegate and forget
- Waiting until the deadline is on top of you
- Ad hoc implementation
- Lack of support structure from management

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Divide and conquer

- Divide policy and procedure writing tasks among your team
  - *Use areas of expertise or responsibility*
  - *Peer review draft work*
- Check in on progress frequently
  - *Load balance as needed*
  - *Recognize team efforts*

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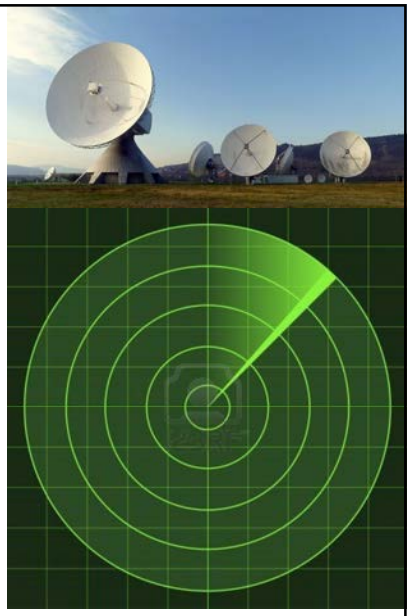
Keep it on the radar



- **Build a timeline**, always keep the end date in sight
- **Set up weekly or bi-weekly progress updates** with entire team
- Have a project manager **review POAM weekly**
- **Address obstacles or challenges quickly**, don't let it throw off your groove!

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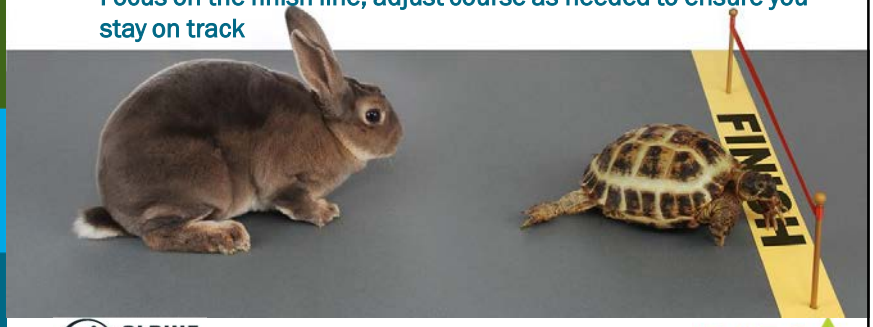
It's ok to be a tortoise! Slow and steady progress wins

- Use your POAM (Plan of Actions and Milestones)
- Complete one task daily
- Have weekly goals/milestones
- Ask for help if you need it
- Focus on the finish line, adjust course as needed to ensure you stay on track



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Real examples of success with DFARS

RECENT PROJECT IN PARTNERSHIP WITH IMEC

- Rockford area manufacturer
- Company has been in business since 1990
- Proudly supports a global customer base, including more than 60 airlines
- Integral part of the DoD supply chain
- Needed to determine current DFARS NIST 800-171 compliance

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Management support is critical

- The President took an active role in the project from the very beginning
- Attended team interviews and weekly meetings
- Reviewed and advised on documentation created by his team
- Continues to support the DFARS 800-171 compliance initiative with goal to fully implement all 110 controls by end of year

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Commitment and teamwork equals success

- Covid-19 hit U.S. right after the project kicked off
- Client had to rapidly pivot, there were some challenges to overcome
- Never lost sight of the end goal, continued to shrink their CUI information system to a very manageable size
- Had tremendous support from IMEC

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Keep your eye on the prize

- Compliance is a big advantage over competitors
- Becoming compliant strengthens the entire U.S. DoD supply chain
- The costs of compliance are less than the cost of a breach
- Security builds brand loyalty, inside and out!

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Other Helpful Resources (Freebies!)

- Security Policy Templates - https://www.sans.org/information-security-policy/
- Policy and/or Framework Templates - https://flank.org/
- Incident Response Playbooks - https://www.incidentresponse.com/playbooks/

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What We Covered Today…

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- Examples from manufacturers of what works – and what does not

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