

Parallel Track 4 - Day 1

Hosted By: **Scott Schwan**, Co-Founder and CEO, *Shujinko*
Rick Harwood, VP of Engineering, *Shujinko*



(OSCAL Webpage)

Bring your coffee or lunch
and join us at **1:45 PM**



NIST: oscal2021@nist.gov
FedRamp: info@fedramp.gov



Leveraging Compliance Automation

For a Cloud-First World

Introduction



Scott Schwan

Co-founder & CEO of Shujinko

Mr. Scott Schwan is a co-founder and serves as Chief Executive Officer at Shujinko. Previously Scott was the director of cloud engineering at Starbucks, where he led a team of talented DevSecOps engineers practicing infrastructure and security-as-code to build a shared platform for Starbucks development teams. Prior to Starbucks, Scott was a technical leader at CardFree, Tommy Bahama, PricewaterhouseCoopers, and SAP. He has a background in security and infrastructure engineering that is heavily focused on IT compliance, retail, e-commerce, mobile order and pay (MOP), and loyalty.

Introduction

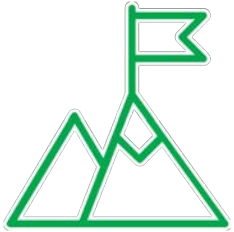


Rick Harwood

VP of Engineering at Shujinko

Mr. Rick Harwood is the VP of Engineering at Shujinko where he is responsible for building innovative software products that simplify, automate, and modernize the management of IT audits. Prior to joining Shujinko, Rick held engineering executive positions at Starbucks where he led some of the most innovative and critical software engineering teams for 8 years. Prior to Starbucks, Rick held a leadership role at the startup Blue Gecko, and software developer/engineering roles at both Amazon and Oracle. Rick hails from Tennessee and attended UW for his bachelor's degree.

Overview



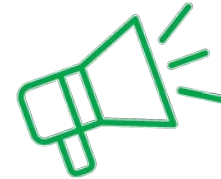
**Digital
Transformation**



**Compliance
Automation**



Current Patterns



**OSCAL in Use
Today**



Questions

The Why of Digital Transformation

- Per Forrester/Accenture, the three main drivers for digital transformation are:
 - Profitability
 - Customer Satisfaction
 - Increased Speed to Market
- “An effective digital transformation program is aware of its interconnectedness with everything within the business.”
- MIT/Capgemini



Digital Transformation in the News

- [“Starbucks to step up rollout of 'digital flywheel' strategy”](#)
- [“Capital One to Shut Down Its Last Three Data Centers Next Year”](#)
- [“Microsoft Analysts: Q1 Shows Payoff From Cloud Shift, Azure Narrowing The Gap With AWS”](#)
- [“Taco Bell's new mobile app the brand's 'biggest innovation since the drive-thru'”](#)

Cloud First - Impacts to Security and Compliance

10 Years Ago



IT
In-House



Apps
Monolithic; Predictable,
infrequent Releases



Data
Centralized; Finite sources
and size

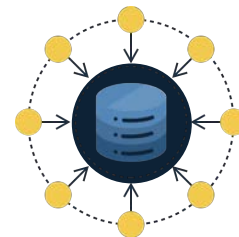
Today



IT
Cloud: Azure, AWS, GCP,
in-house



Apps
Microservices, Changing Daily



Data
Number of Sources; Size & Growth
3rd Party SaaS Tools

Definition - Compliance Automation

- If we reference both the ISACA glossary and the International Society of Automation (ISA) glossary we get the following:
- Compliance Automation
 - The creation and application of technology to monitor and control the adherence to, and the ability to demonstrate adherence to, mandated requirements defined by laws and regulations, as well as voluntary requirements resulting from contractual obligations and internal policies.

Don't Automate for Automation's Sake

Too Much Time



- Manual, labor-intensive, dreaded
- Tons of back and forth

Mess of Tools

- Spreadsheets
- Email, Gdocs, Slack



Compliance Testing

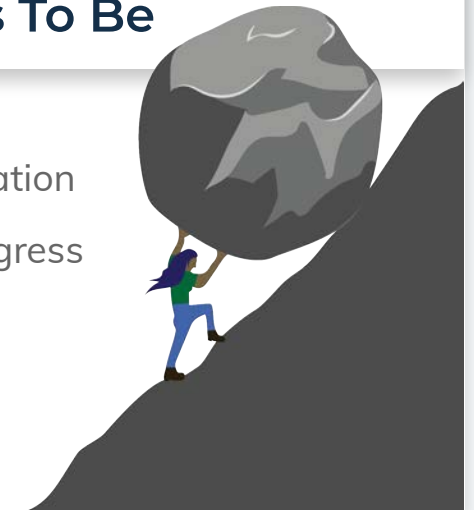
Unclear Communication



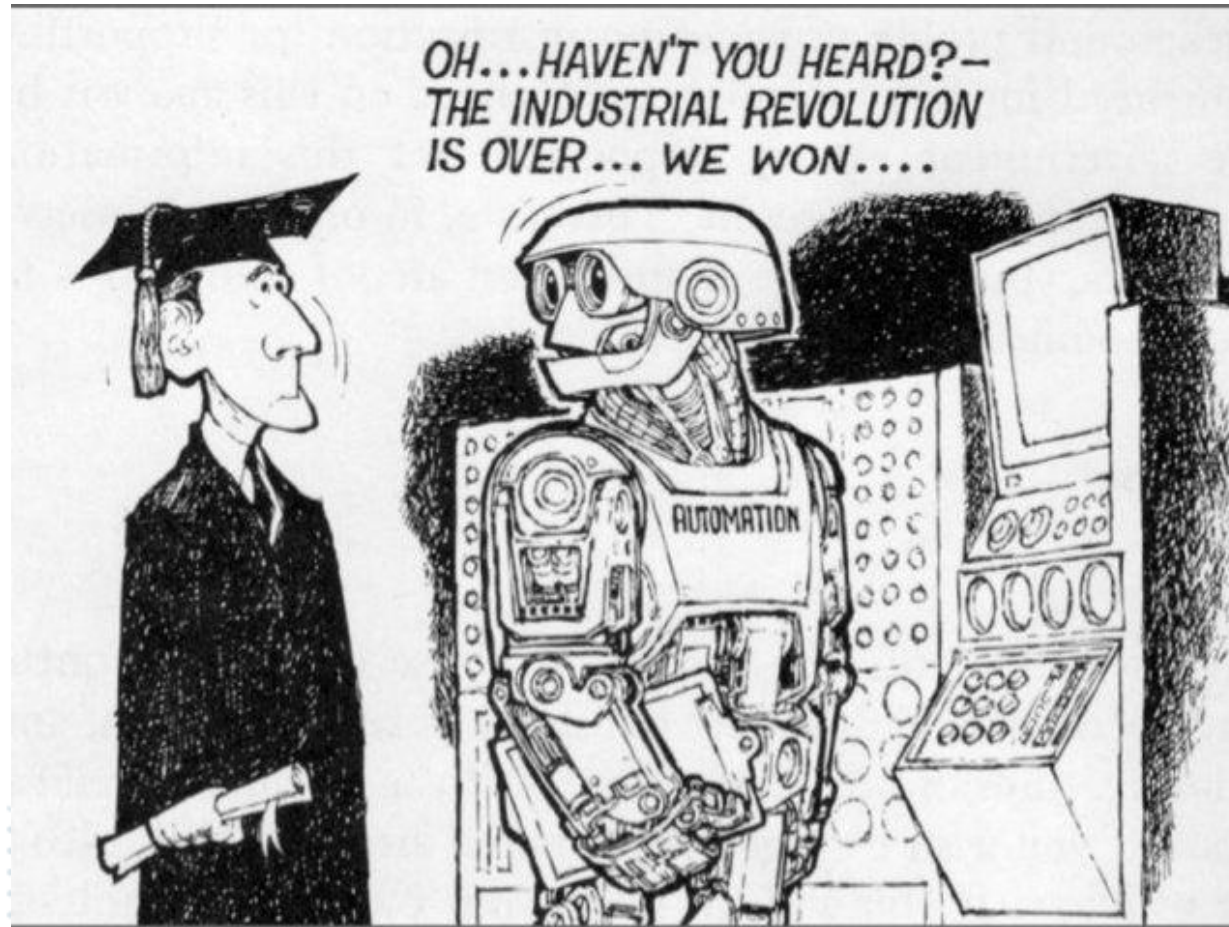
- Engineers are saying:
 - ◆ "What are you asking for?"
 - ◆ Screenshots, organize?
 - ◆ "I HATE this!"

Harder Than It Needs To Be

- Evidence collection & collaboration
- Hard to gauge status and progress



Dispelling the 100% Automation Myth



Compliance Automation - Current Patterns

- Complexity is based upon the automation maturity of an organization
- Patterns are augmenting, not replacing IS audit, control, and security professionals
- Amazingly enough, the engineers you are requesting the evidence from are more than happy to automate themselves out of manual evidence collection
- Prioritize your automation efforts to focus upon the biggest time savers

Pattern - Evidence Requests

✗ Manual

Control and System Owners

The diagram shows a central dark blue circle with a person and server icon. From this circle, 16 lines radiate upwards to 16 green circles arranged in two rows of eight. Each line ends in an arrowhead pointing to a green circle. Below the central circle, the text reads 'Evidence Request Emails, Messages, Task Assignment'.

Evidence Request Emails, Messages, Task Assignment

Audit Document Request List: 200+

✓ Automated

Control and System Owners

The diagram shows a central dark blue circle with a person and server icon. From this circle, three lines radiate upwards to three groups of green circles. Each group consists of two rows of four green circles. Each line from the central circle ends in a bracket that spans the width of one group of circles. From the top of each bracket, four arrows point upwards to the four circles in the top row of that group. Below the central circle, the text reads 'Scheduled Evidence Requests Sent in Accordance with Testing Frequency'.

Scheduled Evidence Requests Sent in Accordance with Testing Frequency

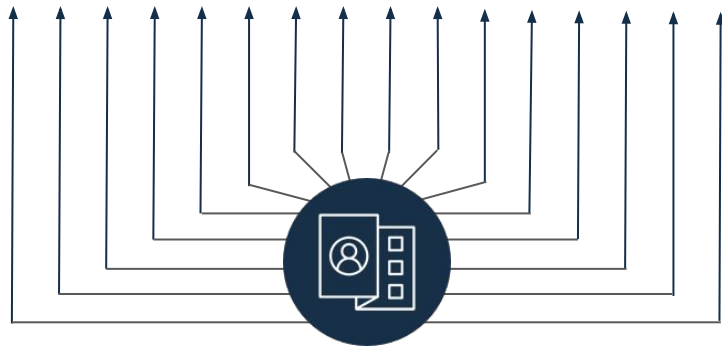
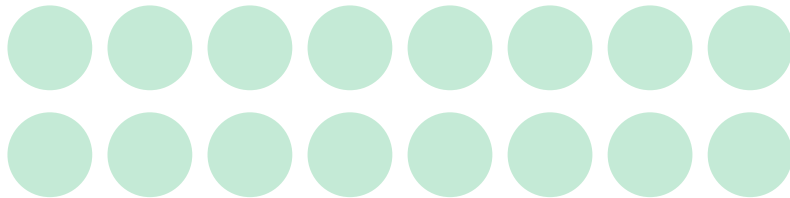
Bulk Requests: 1 Daily, 1 Weekly, 1 Monthly

Pattern - Evidence to Control Mapping



Manual

Controls



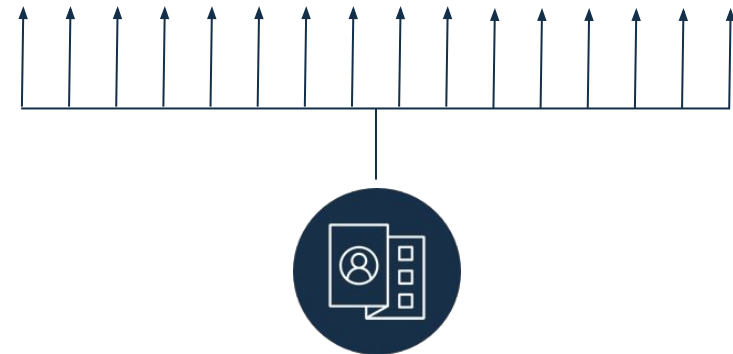
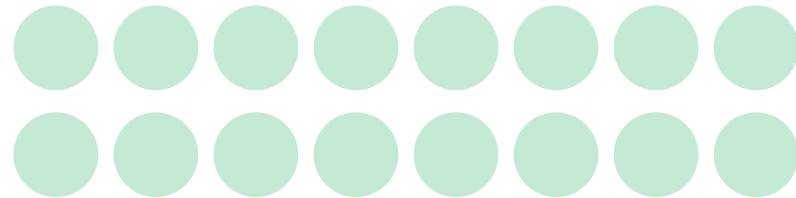
Evidence:
Information Security Policy

23 individual uploads



Automated

Across Controls & Compliance Standards

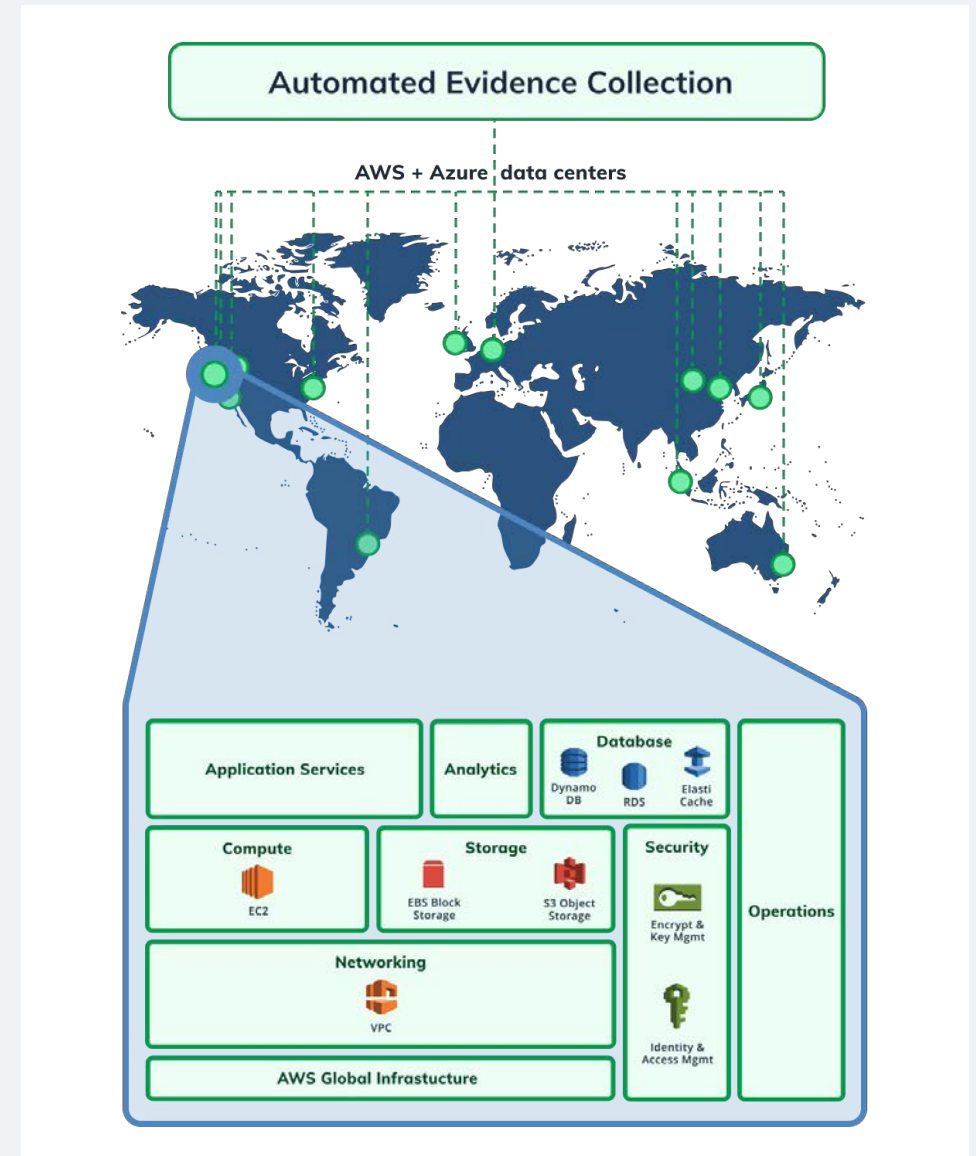


Evidence:
Information Security Policy

1 automated upload

Pattern - Evidence Collection

- Everyone hates screenshots
- Scripting repetitive requests for evidence collection saves time during testing, retesting, and additional sampling
- Biggest challenge is putting the output into a format that maps to the spirit of the control language and isn't just a raw dump of data
- Engineer readable doesn't always translate to Auditor readable



The OSCAL model - initial use case @Shujinko



usnistgov / oscal-content Watch 17

<> Code Issues 14 Pull requests Actions Projects Wiki Security Insights

master oscal-content / nist.gov / SP800-53 / rev4 / json / NIST_SP-800-53_rev4_HIGH-baseline-resolved-profile_catalog.json

oscalbuilder Publishing auto-converted artifacts Latest commit 9fd42a9 3 day

2 contributors

Sections Requirements **Controls** Evidence Items

Search Controls Filter by Assignee Filter by Section Filter by Status

Showing 9 results out of 9

Control	Company Status	Auditor Status
AC-1 Access Control Policy and Procedures	In Progress	Follow Up
AC-2 Account Management		
AC-3 Access Enforcement		
AC-4 Information Flow Enforcement		
AC-5 Separation of Duties		
AC-6 Least Privilege		

Control AC-1 Access Control Policy and Procedures

AC-1 Access Control Policy and Procedures

Control Description

The organization:

- a. Develops, documents, and disseminates to [Assignment: organization-defined personnel or roles]:
 - 1. An access control policy that addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance; and
 - 2. Procedures to facilitate the implementation of the access control policy and associated access controls; and
- b. Reviews and updates the current:
 - 1. Access control policy [Assignment: organization-defined frequency]; and
 - 2. Access control procedures [Assignment: organization-defined frequency].

Add Control Language

Control Status: In Progress Auditor Status: Follow Up

Control Workspace Internal Reference

The OSCAL Model - In Software-as-a-Service

The screenshot displays the AuditX+ web interface. On the left is a dark sidebar with navigation icons for Audits, Integrations, Frameworks, Files, Foreman, Templates, Cloud Accounts, Users, Partners, Company Info, and Support. The main content area is divided into a left-hand 'Requirement' list and a right-hand control configuration panel.

Requirement List:

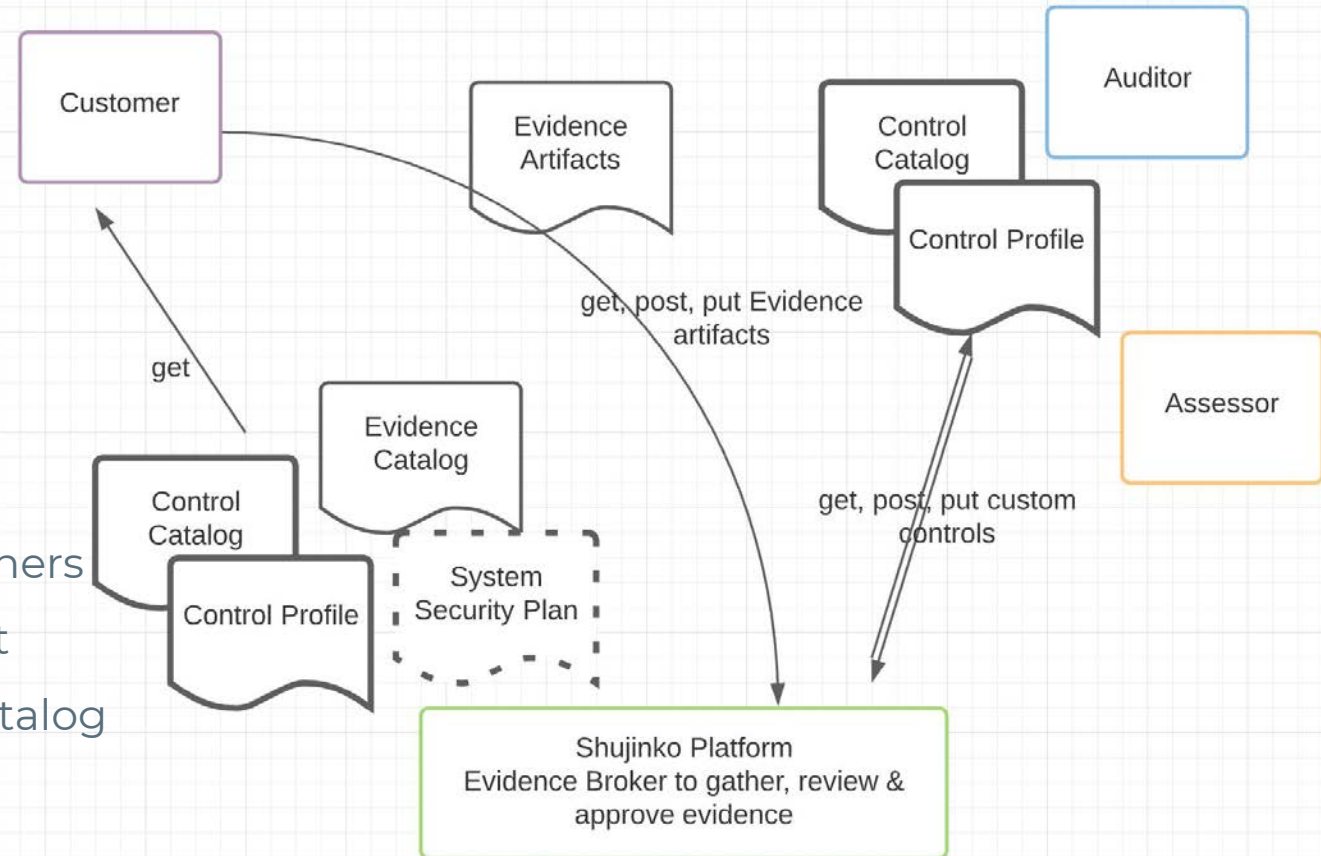
- AC Access Control Access Control Policy and Procedures
- AC Access Control Account Management
- AC Access Control Access Enforcement
- AC Access Control Information Flow Enforcement
- AC Access Control Separation of Duties
- AC Access Control Least Privilege
- AC Access Control Unsuccessful Logon Attempts
- AC Access Control System Use Notification
- AC Access Control Concurrent Session Control
- AC Access Control Session Lock
- AC Access Control Session Termination
- AC Access Control Permitted Actions Without Identification or Authentication

Control Configuration Panel (AC-2(3) Account Management | Disable Inactive Accounts):

- Status:** Control Status is set to 'Not Started' and Auditor Status is 'Unreleased'.
- Description:** The information system automatically disables inactive accounts after [Assignment: organization-defined time period].
- Buttons:** 'Add Control Language', 'Control Workspace', and 'Internal Reference'.
- Access:** A message states 'The auditor currently can NOT see this Control.' Below it is a 'Release to Auditor' toggle switch, currently set to 'OFF'. A note explains: 'Setting toggle to ON will give your auditor access to this Control and its associated evidence.'
- Assignees:** 'Assignees (0)' with a note: 'This Control is currently unassigned.'
- Evidence Items:** 'Evidence Items (0 of 3 Uploaded)'. The list includes:
 - Complete list of separated employees with termination dates for the period under audit. Include screenshots/support showing how the list was created (e.g. queries, search parameters, etc)
 - Configuration settings to automatically remove or disable temporary, emergency and inactive accounts according to schedule (e.g. 90 days)
 - Complete list of disabled information system accounts along with the name of the individual associated with each account
- Audit Scope:** Currently empty.
- Tracked Requests:** 'Tracked Requests (0)' with the note 'No tracked requests.'

The OSCAL model - next use cases @Shujinko

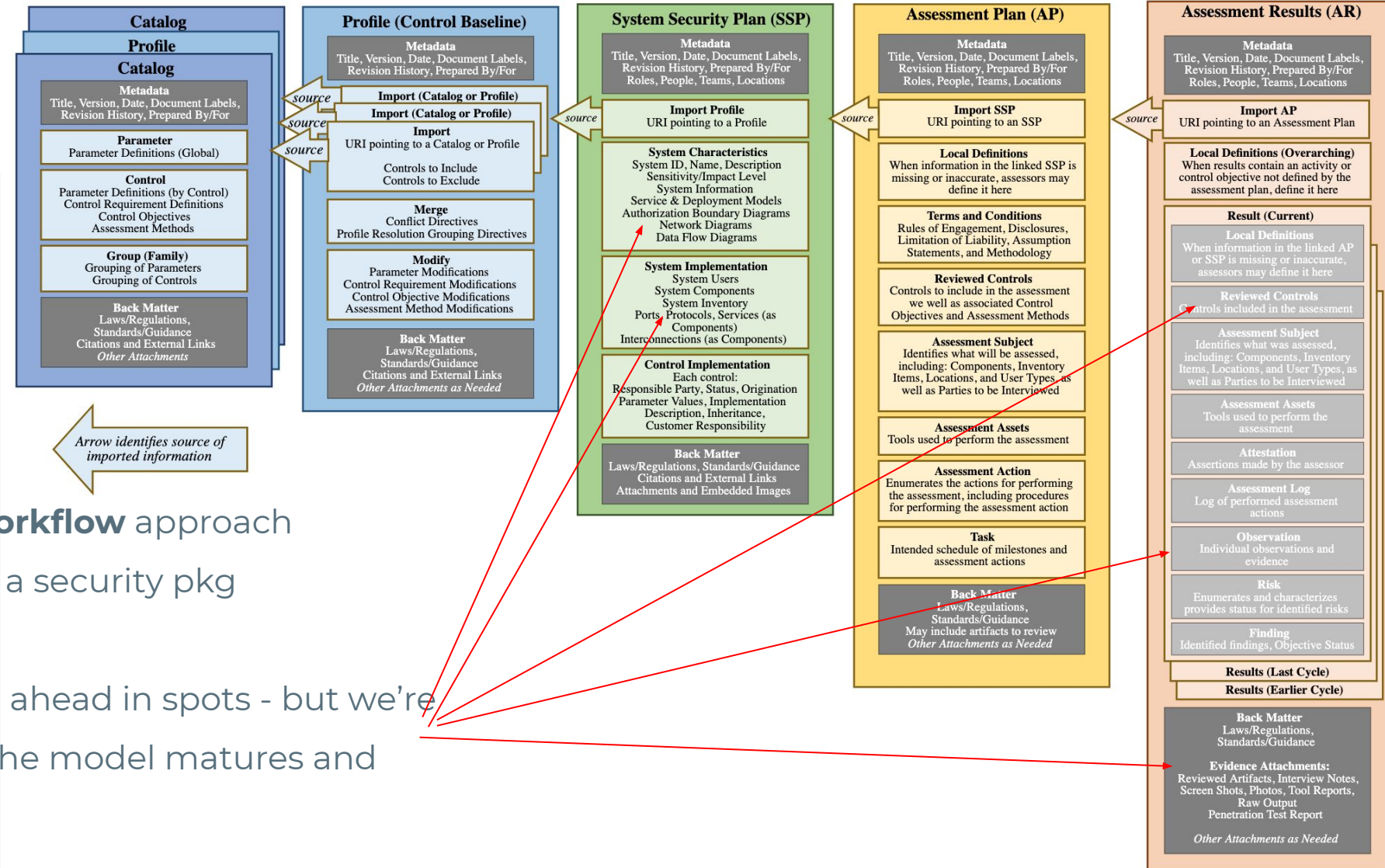
```
"value": "Build and Maintain a Secure Network and Systems"
  },
  "groups": [ {
    "id": "1",
    "title": "Install and maintain a firewall configuration to protect cardholder data",
    "provs": [ {
      "name": "label",
      "value": "Requirement 1"
    } ],
    "parts": [ {
      "id": "s1_smt",
      "name": "objective",
      "prose": "Firewalls are devices that control computer traffic allowed between an entity's networks"
    } ],
    "controls": [
      {
        "id": "1.1",
        "title": "Information security roles and responsibilities",
        "provs": [ {
          "name": "label",
          "value": "1.1"
        } ],
        "parts": [ {
          "id": "s1.1_req",
          "name": "requirement",
          "prose": "1.1 Establish and implement firewall and router configuration standards that include"
        } ],
        {
          "id": "s1.1_gdn",
          "name": "guidance",
          "parts": [ {
            "id": "s1.1_gdn.1",
            "name": "item",
            "prose": "Firewalls and routers are key components of the architecture that controls entry"
          } ],
        }
      ]
    }
  ]
}
```



Build API Capabilities for Customers, Partners

- Expose Control Catalog Management
- Push Evidence & Map to Evidence Catalog

The OSCAL model - driving further Automation



Aligned with **continual workflow** approach

- Well beyond creating a security pkg

Being a startup, we've run ahead in spots - but we're excited to incorporate as the model matures and companies adopt

Q&A

Thank You

Automated Audit Preparation

Simplify, Automate, Modernize



shujinko.io

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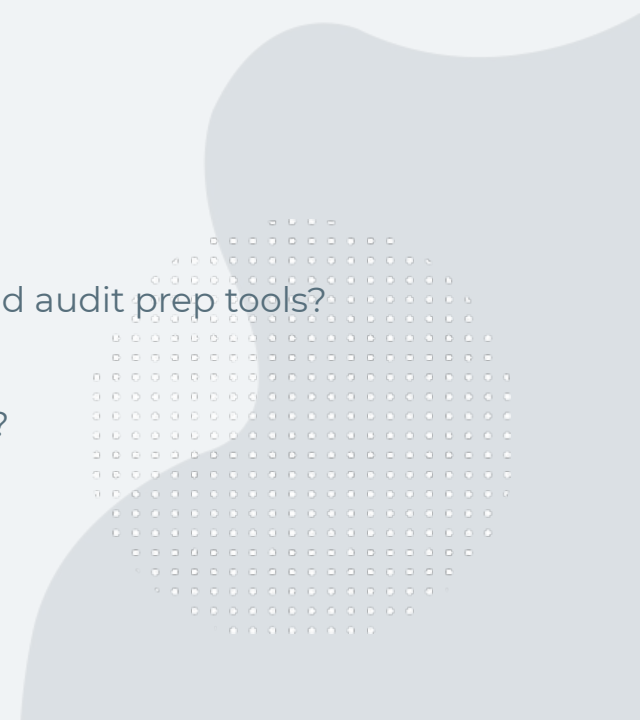
Please return to the main [BlueJeans Event Platform](#). The next event begins at **2:30 PM**.



NIST: oscal2021@nist.gov
FedRamp: info@fedramp.gov

Abstract

- What is driving companies to migrate to the cloud and how will it play out?
 - Slides 6 - 9
- What are the implications for security, compliance, and audits?
 - Slide 11
- What is the right level of automation to increase efficiency in audit prep but not incur additional risk?
 - Slide 15
- Why will automation augment and not replace IS audit, control, and security professionals?
 - Slide 16
- How are compliance automation tools being adopted today?
 - Slide 17 - 21 - Need to update OR replace these
- How does OSCAL's framework enable automated evidence collection and audit prep?
 - New content
- How will standardizing controls in a format that's machine-readable affect vendors of GRC and audit prep tools?
 - New content
- How can OSCAL's framework be incorporated into open APIs in audit prep tools in the future?
 - New content



Call to Action

- Digital Transformation and Cloud First Strategies are here to stay
- There's been a seismic shift in the way we work
- As IS audit, control, and security professionals, we need to learn the tools available to us and leverage them to keep up with the rate of change
- The Compliance Automation and Compliance Automation Testing space is maturing with new tools every day, we should start learning and becoming experts with these tools so that we can keep up



Adoption of Cloud-First Strategies

- A growing majority of companies are aligning their digital transformation with cloud first strategies
- The public cloud providers have been effective in associating their offerings with the three main drivers of digital transformation
- Reflected in their tremendous year-over-year revenue growth
- A global pandemic didn't even stall this growth

Our Cloud-First World

Month and Day	File Year Range	Search Results	Keyword(s)
Nov. 16th	2010 - 2015	551 mentions	“Digital Transformation”
Nov. 16th	2015 - 2020	8,750 mentions	“Digital Transformation”
Nov. 16th	2010 - 2015	70 mentions	“Cloud First”
Nov. 16th	2015 - 2020	423 mentions	“Cloud First”

SEC.gov EDGAR

- The new EDGAR advanced search gives you access to the full text of electronic filings since 2001.

Surviving in a Cloud First World

- [A Sense of Urgency: Surviving in the Age of Digital](#) by Jonathan Smart
- “The rate of creative destruction is now faster than ever. In 1964, a firm listed on the S&P 500 Index could expect to remain on the index for thirty-three years. By 2016, that tenure had fallen to twenty-four years. By 2027, companies can expect to spend no more than twelve years on the index before they’re replaced.”

Compliance Automation is Poorly Defined

- This seems wrong...
- “Compliance automation, also known as automated compliance, is a category of software applications that use artificial intelligence (AI) features and technology to simplify compliance procedures. These applications provide organizations with workflow capabilities related to compliance, including self-assessments, control analyses, corrective action planning and controls testing...” Blah blah blah
- Let’s fix it...



Definition - Compliance Testing Automation

- If we reference both the ISACA glossary and the International Society of Automation (ISA) glossary we get the following:
- Compliance Testing Automation
 - The creation and application of technology to monitor and control the testing of controls designed to obtain audit evidence on both the effectiveness of the controls and their operation during the audit period



Pattern - CI/CD Pipeline

- Deployments are required to be automated with compliance gates in the pipeline
- Control testing occurs early and often with near real-time feedback
- Compliance reports can be run against code and placed in an evidence repository for review and collection

