ADVANTAGE DOD 24

RISK CENTRIC, AGILE CYBER ASSURANCE (E.G. AUTHORIZATION TO OPERATE)

Mr. Danny Holtzman
CDAO

Questions?
www.slido.com
#ADOD24

Contact: osd.cdao.ovl@mail.mil

CDAO

Chief Digital & Artificial Intelligence Office

Risk-Centric, Agile Cyber Assurance (Authorization to Operate) Fireside Chat

Daniel C. Holtzman
Chief Information Officer (CIO);
Cyber Assurance Officer;
Authorizing Official (AO) &
Senior Component Official for Privacy (SCOP)
DOD Chief Digital & Artificial Office (CDAO)
Office of the Secretary of Defense (OSD)

Authorizing Official for:
DoD CDAO
OSD AARO
JSF F-35 ALIS

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Decision Advantage From the Battlefield to the Boardroom
Acceleration of the DoD's Adoption of Data, Analytics, and AI

osd.cdao.ovl@mail.mil

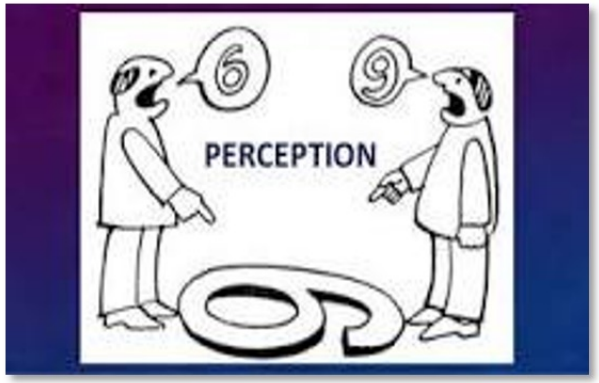
Agenda

- **Culture Check Challenge**
- **AO Ecosystem/OVL**
- **Fireside Chat**
  - Risk-centric, Agile Cyber Assurance (Authorization to Operate)
- **Back-up info on Operation Vulcan Logic**

> *Cybersecurity and resiliency is a journey; not a destination.*
>
> — D.C. Holtzman

Culture Change Challenge:
Unperceived Bias

> *Cool, you 3D printed the save icon!*



Two thirds of children don't know what a floppy disk is

Children aged 6-18 were shown the photos below and asked if they knew what each was. Figures shown are the % of children who either said they didn't know what the item was, or gave an incorrect answer (children answered in their own words)

Do you know the answers to these?

Do you realize your own bias?

<u>Communication is key to culture change</u>

"Change your thoughts and change your world." – Norman Peale

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> *The most dangerous phrase in language is:*
>
> ***We've always done it this way***
>
> — Admiral Grace Hopper, USN

Operation Vulcan Logic (OVL): *BLUF*

See Handout

OPERATION VULCAN LOGIC

Operation Vulcan Logic (OVL) is a mature, proven, agile Ecosystem that achieves the intent of the RMF.

BACKGROUND:

- The ATO execution process in general, to date, has been very resource and time intensive. While the ATO approval process is an important contributor to implementing cybersecurity and managing risk, delays in fielding new systems and capabilities can bring their own risks by extending the use of legacy (often less secure) capabilities.
- DODs RMF implementation intent is to deliver secure, resilient, and survivable mission functionality, where the system design achieves the right balance between mission and cyber functionality such that the system can perform all necessary mission functions, in a cyber-contested environment, with an appropriate level of risk.
- Operation Vulcan Logic (OVL) is a risk centric, agile, authorization Ecosystem where the Authorizing Official (AO), the programs, and the systems/capabilities seeking authorization have clear outlined Criteria, Observables, and Behavior (COB) expectations and templates to leverage, based on over 2,000 successful implementations.
- OVL is rooted in the tenants outlined in NIST SP 800-160 and the innate responsibility of practicing Systems/Systems Security Engineering – which are Cyber Security and Resiliency Enablers, throughout the system development lifecycle (SDLC). It is this same Systems/Systems Security Engineering that will be relied upon to produce the evidentiary data, and analysis.
- For the AO to assess, determine, and articulate the risk of use for systems/capabilities withing their boundary, a flexible process flow has been outlined to assist the programs and CRAs (Cyber Risk Assessor play a similar role as Security Control Assessor (SCA) in communicating with a common frame of reference.

1 PHASE 1

Systems/Systems Security Engineering Evidentiary Data & Analysis

- Architectures
- System Boundaries
- Functional Requirements Decomposition
- Data Flows
- Technologies
- Previous Assessments
- Test Results (Red/Blue/Etc.)

Standard Acquisition Systems Engineering Data

Grow it in

PROGRAM MANAGEMENT

- Facilitate Risk management across all stakeholders in an integrated, holistic manner

2 PHASE 2

Collaboration with AO/CRA

- Discuss risk assessment and way ahead
- Mapping of Authorization Strategy to meet Acquisition/Execution Strategy/Need
- Maximize re-use of previous assessments analysis results
- Operational Use Perspective

COLLABORATIVE EXECUTION

- Partnerships with all stakeholders enables a holistic view and enables reciprocity

3 PHASE 3

Continually Execute Risk Assessment

- Tool Agnostic - Focus on Evidentiary Data and Analysis
- Clinically define Risk of Use Posture
- Outline Mitigations for Risks
- Persistent Penetration testing and CONMON

Starts never ending journey of continuous assessment & monitoring

ENABLERS

- Single, Lead AO for each system/capability
- Stakeholder collaboration via "AO Committee"
- Streamline expectations and increase Agility

https://arlo-solutions.com/ovl

OPERATION VULCAN LOGIC

COMMUNITY FEEDBACK

CRA Training - "This training was very well put together – The only suggestion I have is to get this training out as soon as a CRA/SCAR is on boarded. I am also implementing this training for all my SCARs as I need them to know what I know. I hate to say to make this training Mandatory, but in this case, I think it should be for all SCAs and SCARs." Gary "Scott" Ennis, AFNWC/CNXZT Security Control Assessor, Assessments Branch, Ground Based Strategic Determent (GBSD)

CRA Training - "This training needs to be provided to the Program also. The flow diagram needs to be stressed. The responsibility to provide all the necessary documentation to the CRA and the independent role of the CRA needs to be emphasized to the Program." Denise Madison, Enterprise Information Systems Security Manager (ISSM), Cybersecurity, F-35 Lightning II Joint Program Office

CRA Training - "My only suggestion would be for the example documentation to be available to non-CaC holders." Aaron Owens, Director of Security (DoS), Second Front Systems

DSOP - "They're very detailed, and I think they cover quite a bit to help organizations adopt DevSecOps. I especially love the call to action(s) in the documents, the need for change to actually implement innovation." Brian Fox - Director of the National Security and Intelligence Portfolio, 18F

DSOP - "Thank you for the opportunity to review the DSOP CONOPS. My overall thoughts on the document are that it is very user friendly, especially with the "Tips to Success". From my perspective with an AO providing that information, it shows the project that you are wanting the project to be successful and giving them what you are looking for up front so that the project would be able to answer the majority of the questions you would have." Steven Pruskowski – cisa.dhs.gov

OVL implementation of the DAF Fast track - "What 'Fast Track' really provides is agility. It means we're not stuck once we go down a road and find out six months later that there's a better path. It allows us to experiment boldly and remove items that aren't adding the value we initially thought they would. It empowers you with freedom, then demands you to exercise it judiciously." Brandon Johns, NH-04/GS-15, Chief Security Officer, AFLCMC Det 12, Kessel Run

SAMPLE ONBOARDING MODULES

Module 0: AO's Perspective
- Mr. Holtzman

Module 1: OVL
- What is it?
- Background
- Elements
- Fast Track and RMF

Module 2: AO
- Introduction
- Roles and Responsibilities
- AODRs
- AO Objectives, Enablers, and Collaborations
- AO Playbook v1.0

Module 3: Cyber Risk Assessor (CRA)
- Introduction
- CRA Responsibilities
- CRA Objectives v1.0
- CRA Onboarding v1.0
- CRA Playbook v1.0

Module 4: Body of Evidence, Artifacts, Information Tools
- AO Determination Brief
- AO Determination Brief Guide
- CRA Recommendation Letter
- DSOP CONOPS if applicable
- Draft AO Authorization Letter
- ITCSC

Module 5: CRA Assessments
- In/Out Briefing
- Assess-Only Process
- Security Assessment Plan (SAP)
- Risk Assessment Report (RAR)
- Security Assessment Report (SAR)
- Plan of Action and Milestone (POA&M)
- Authorization Determination Package (Minimal Requirements)

Module 6: Continuous Execution
- Continuous Monitoring Plan (ConMon)
- Conditions/Residual Risks
- Sustainment and Maintenance
- No Security Impact (NSI)
- STIGs and Scans
- Risk Assesment Report
- Reciprocity
- Repository (eMASS/Xacta, etc.)

Module 7: Agile Authorization Ecosystem
- Putting All of This Together
- Phased Approach
- Summary

"Absolutely executable for Special Access Programs (SAP)... proven to be able to do so. Development of a system will not be constrained by executing this logic... if you do this well, a program will identify MORE during stages in which changes/mitigations can be made earlier on... and it will prove fruitful later – as a more secure system... or maybe even discovering that you didn't get what you asked for."

JACK W. RHODES III, Lt Col, USAF, Program Manager, DAF SAP Enterprise Information Technology Program Management Office

Proven Risk-based Ecosystem

Over 2,000 Authorizations

Across domains

Achieved Reciprocity

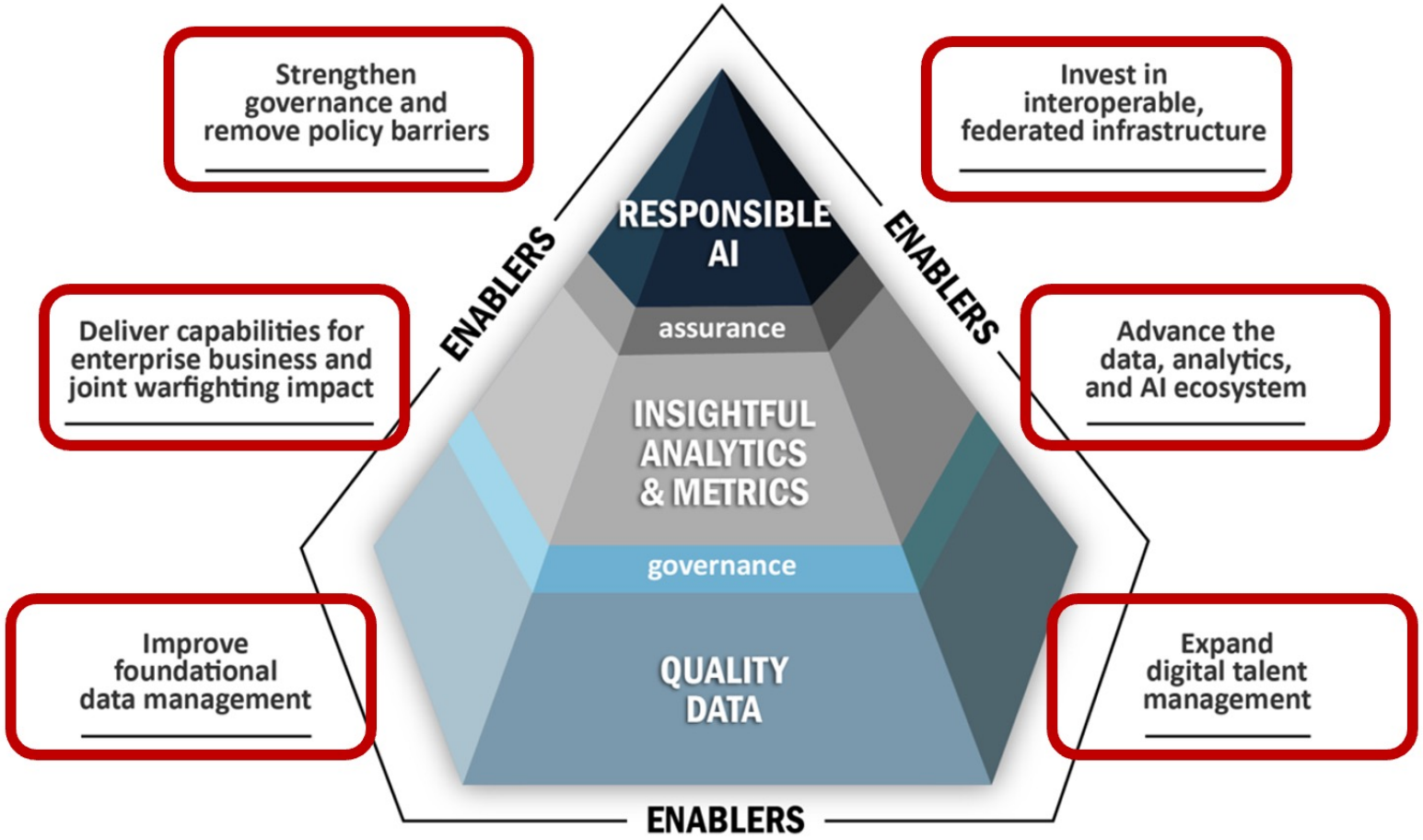
Agility in execution

Continuous updating

Collaboration with Industry via NDIA

CDAO

Enabling the Data, Analytics, and AI *Adoption Strategy*



Cyber risk is highly fluid, Temporal and Contextual.
Operation Vulcan Logic (OVL) is a risk centric, agile, authorization Ecosystem

CDAO Organizational Risk Tolerance Baseline (ORTB): *Foundational Areas of Risk – Analytics based impact*

1. **Account Management (Aligns to ORTB: AC-2)**
   Monitor and Enforce user and group account creation/deletion
2. **Administrative Privileged Accounts (Aligns to ORTB: AC-6)**
   Privileged user/service accounts are only authorized to perform security relevant functions. Review and approve annually.
3. **Audit Review, Analysis, and Reporting (Aligns to ORTB: AU-6)**
   Review and analyze Information System (IS) audit logs for indications of inappropriate or unusual activity and reports findings to designated personnel IAW IRP
4. **Boundary Protection (Aligns to ORTB: SC-7)**
   Monitors and controls communications at the external boundary of the system and at key internal boundaries within the system
5. **Continuous Monitoring (Aligns to ORTB: CA-7)**
   System level monitoring metrics, including control monitoring frequencies, are defined by the organization and approved by the AO
6. **Data Integrity (Aligns to ORTB: SI-7)**
   Employ automated tools to report system (hw/sw/fw) and information (data) integrity violations. Ensure automatic integrity validation of all electronically transmitted software and data
7. **External Connections (Aligns to ORTB: CA-3)**
   Agreement/authorization used to approve external connections and manage the exchange of information should be defined (ATC, ISA, CSA, ICD, etc.) and reviewed annually
8. **External Media (Aligns to ORTB: AC-4, MP-7)**
   If authorized, place configuration control process on all external media including auditing. Institute external media whitelisting. Implement processes to monitor logs and audit usages.
9. **Information Flow Enforcement (Aligns to ORTB: AC-4)**
   The information system enforces approved connections for controlling the flow of information within the system and between interconnected systems
10. **Least Privilege (Aligns to ORTB: AC-6)**
    Reviews, at least annually, the privileges assigned to privileged user accounts including Designated Transfer Agent and Trusted Cloud Credential Manager roles
11. **Operational Change Management (Aligns to ORTB: CM-8, CM-8(3), SI-7)**
    Automated mechanisms shall be used to detect the presence of unauthorized hardware/software/firmware within the system. One or more of the following action shall be taken upon discovery of unauthorized components: disable network access by unauthorized components; isolate unauthorized components; notify designated personnel identified in IRP
12. **Proposed Equipment (Aligns to ORTB: SA-22–applies to C.I.A. impact High on non-SAP systems, CM-3)**
    Lock down all mission support systems and migrate off unsupported operating systems. Review support agreements (hw/sw/fw) annually
13. **Protection of Information at Rest (Aligns to ORTB: SC-28, SC-28(1))**
    Encryption is implemented to complement protection of information at rest, using approved cryptographic methods for data encryption
14. **Secure Baseline Configuration (Aligns to ORTB: CM-2, CM-6)**
    This Information System's secure configuration includes DoD Security Technical Implementation Guides or industry best practices and verified conformance prior to introduction into production or operational environments
15. **Security Categorization (Aligns to ORTB: RA-2)**
    Enforce proper security categorization and review annually
16. **Separation of Duties (Aligns to ORTB: AC-5)**
    Separates defined duties of individuals and documents separation of duties of individuals
17. **Vulnerability / Anti-Virus Scanning (Aligns to ORTB: RA-5)**
    Conduct routine anti-virus scans on traditional IT systems and hosted applications. Institute continuous monitoring protection on all IT systems to include maintenance and testing support systems

*Red font indicates specific JSIG, Non-Tailorable controls

CDAO Organizational Risk Tolerance Baseline (ORTB): *Draft AI-Specific Areas*

AI Foundation (Aligns to CDAO ORTB: 4/5/6/13/17)
- Encrypt any stored AI-related data and models
- Regularly patch AI components (hardware and software) on known vulnerabilities and update threat definitions
- Account for vetting of AI supply chain

Data Integrity (Aligns to CDAO ORTB: 4/6/9/11/17)
- Depict provenance and lineage of datasets used for training models
- Implement mechanisms that ensures the integrity and authenticity of ingested data against adversarial attacks.
- Ensure privacy of personal data, anonymizing information where necessary
- Establish data retention and disposal mechanisms

Model Management (Aligns to CDAO ORTB: 3/4/11/17)
- Depict architecture, justification, and rationale for the selection of a specific model
- Establish regular evaluation and validation procedures of training models
- Ensure rollback mechanism for models, configurations, and training data

Operational Resilience (Aligns to CDAO ORTB: 3/5/14/17)
- Regularly employ red teaming testing methodologies and maintain logs of outcomes
- Continuously monitor system performance metrics against predefined benchmarks or thresholds for validation

User Interaction (Aligns to CDAO ORTB: 1/2/10/16)
- Incorporate mechanisms for users or other stakeholders to provide feedback on model output
- Implement oversight on user interactions, including data input, queries, and code base changes

Responsible Accountability (Aligns to CDAO ORTB: NEW)
- Implement tools and/or methodologies that can elucidate model decisions
- Implement DoD Responsible AI (RAI) principles

Seeking Collaboration with Industry to flush out, path find, validate

*Draft AI-Specific Cyber Risk Areas are derived from—and aligned to—CDAO ORTB Foundational Areas of Risk

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> *Artificial intelligence is a tool, not a threat*
>
> — Rodney Brooks

Risk-Centric, Agile Cyber Assurance:
Authorization-to-Operate Fireside Chat

- **What keeps you up at night regarding Cyber, AI and Agile Authorizations in the DoD?**
- **What are your challenges with Agile Software development? DevSecOps?**
- **What are your top 3 Cyber and Agile Authorization challenges?**
- **What are your top 3 recommendations with respect to Cyber, AI, and Agile Authorizations?**

How Can CDAO Help You?

Do You Have a Success Story?

CDAO / Industry Round Table: To Be Announced in April

CDAO

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Operation Vulcan Logic (OVL)
On-Boarding

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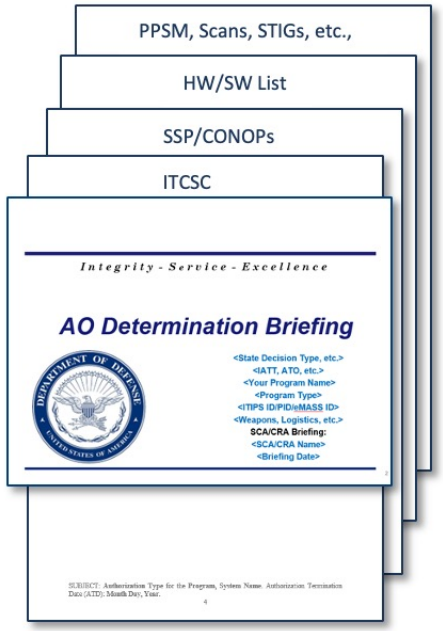
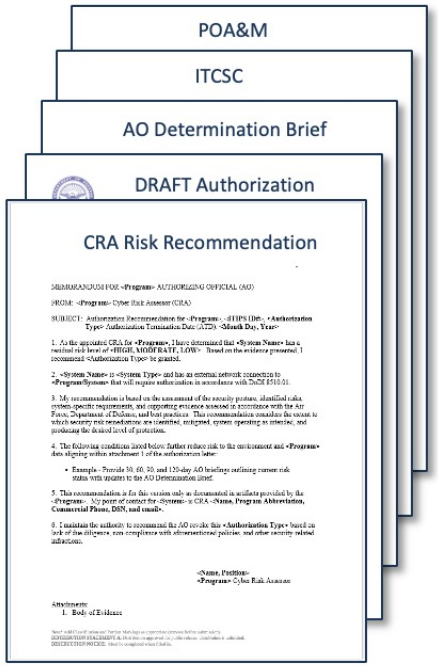
Operation Vulcan Logic (OVL) Authorization Templates
Simple, Effective, Agile

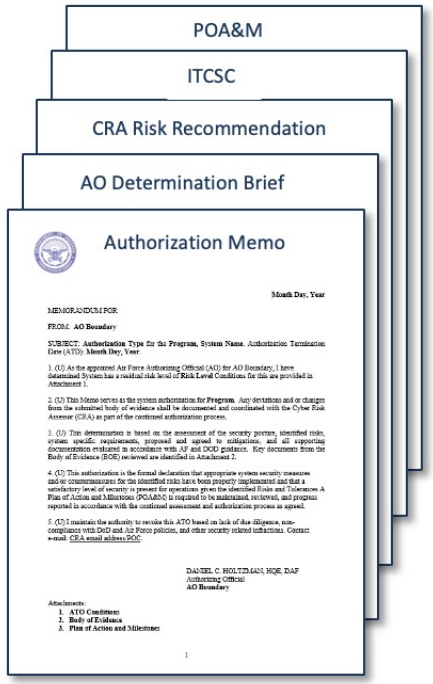
AO Determination Briefing and Supporting Evidence



CRA Risk Recommendation



Authorization Package



Meets all DoDI 8510 and DAF policy requirements for RMF

Authorization Memo has list of BOE that was used to increase reciprocity

Not a workflow or set of "artifacts'

Risk Analysis informed by threat/intel, stakeholder tolerance and operational mission parameters

Provides the AO with an independent Assessment

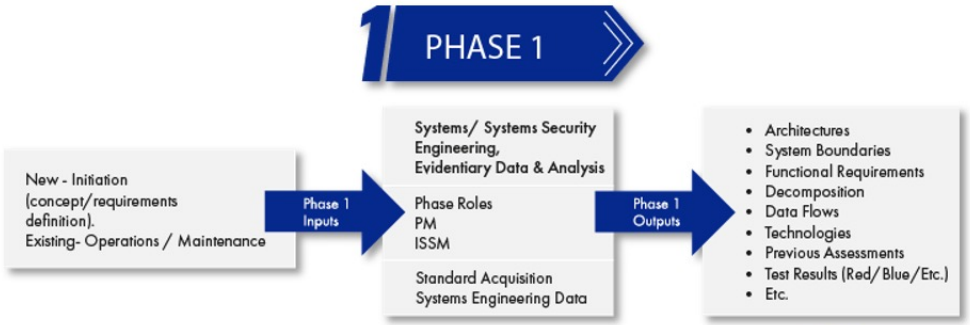
Not a one-time product, developed over time working hand in hand

Authorization starts the lifelong commitment to improving cyber every day

Standardization is Flexible for Authorization Packages; No One-Size-Fits-All Approach

CDAO

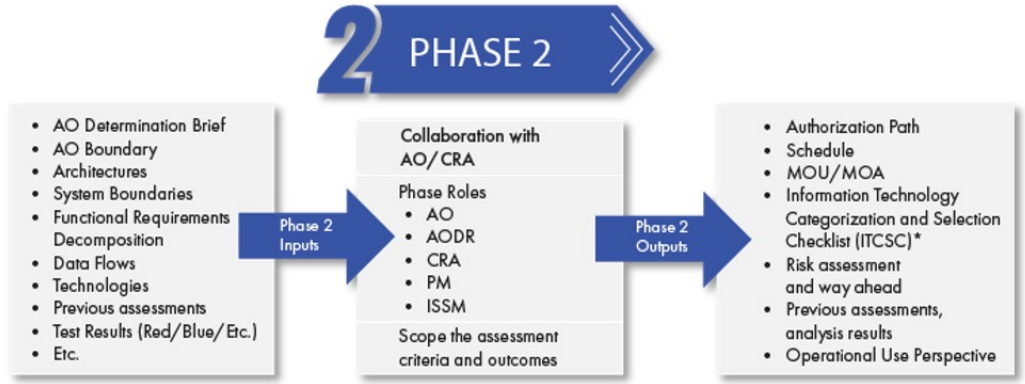
Agile Authorizations:
Enabled by Disciplined Systems Engineering



Focus on what is known

Continue to move forward

Articulate Risk of Use



Iterative

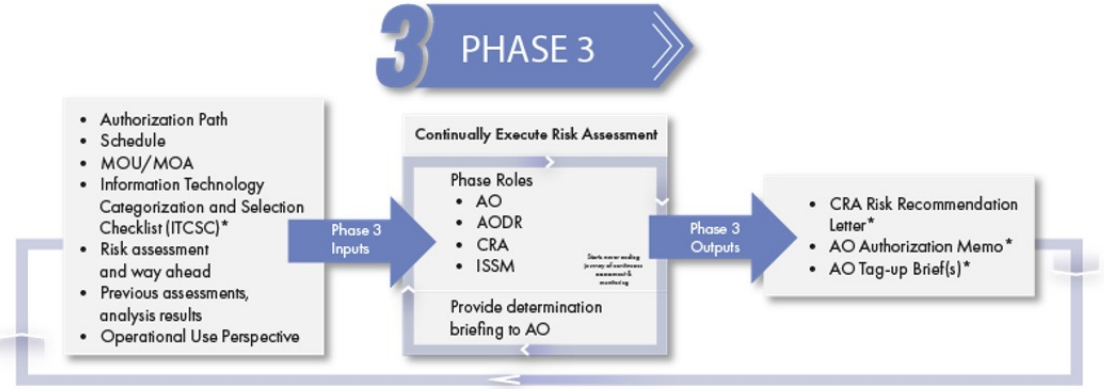
Agile

Risk-Based

Requires solid foundations

Systems Engineering Up Front

Lifelong Commitment



Operation Vulcan Logic (OVL) Ecosystem: *Systems Engineering-Based*