Avoid Fines & Save Money! **Automating Regulatory Compliance Matt Coose** Founder and CEO, Qmulos **Scott Armstrong** Chief Strategy Officers Qualos .conf2016

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Agenda



Agenda

- What Is IT Security Compliance?
- Technical Elements
- Lessons Learned
- Benefits
- Use Cases
- Live Demo Of Compliance And Audit Capabilities

IT Security Compliance – Key Requirements



What Is IT Security Compliance?

In this context, it means providing **EVIDENCE** that you are doing **risk management processes** according to the appropriate IT Security **framework(s)**

Automated solutions must address:

- Processes
- Monitoring of frameworks/security controls
- Evidence collection

Process

RISK MANAGEMENT FRAMEWORK

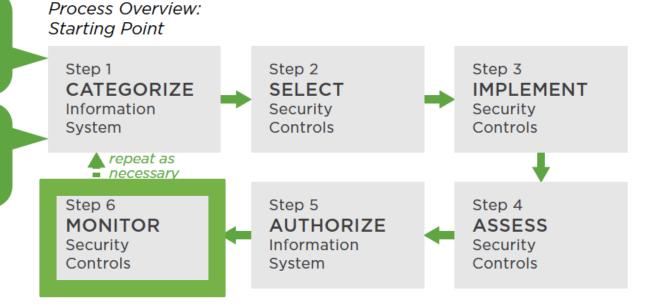
Architecture Description:

- Architecture Reference Models
- Segment and Solution Architectures
- Mission and Business Processes
- Information System Boundaries

Organizational Inputs:

- Laws, Directives, Policy Guidance
- Strategic Goals and Objectives
- Priorities and Resource Availability
- Supply Chain Considerations

(Source: Guide for Applying the Risk Management Framework to Federal Information System, NIST, Feb 2010)



Monitoring

Potentially thousands of controls, sub-controls, and enhancements

Different types of controls include management, operational, and technical

Technical controls and continuous monitoring

Enable actionable compliance























Evidence

Different sources and frequencies

• Policies, procedures, documents

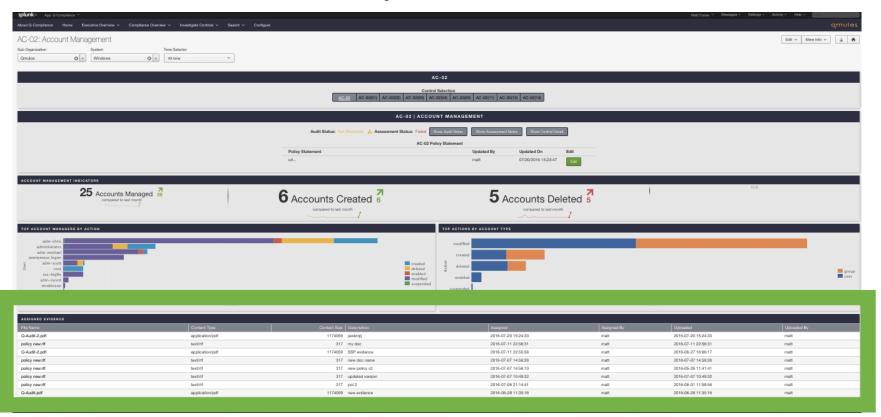
Technical

Human activity!

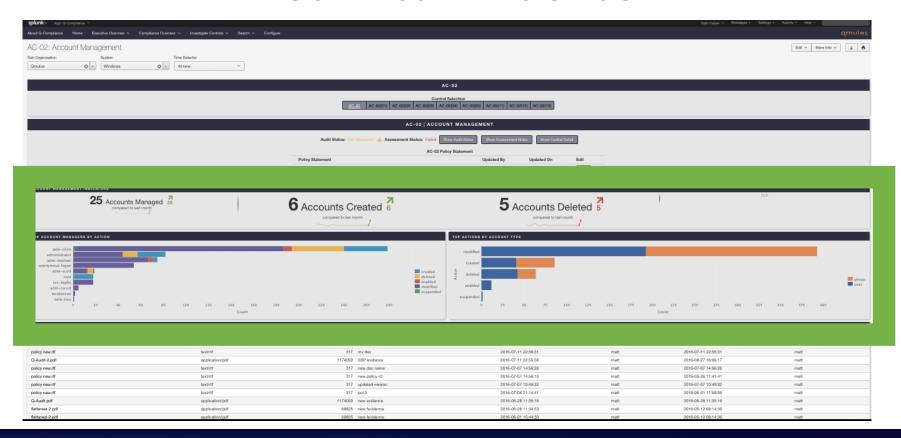
Dynamic evidence – auditor questions!



Policy Evidence



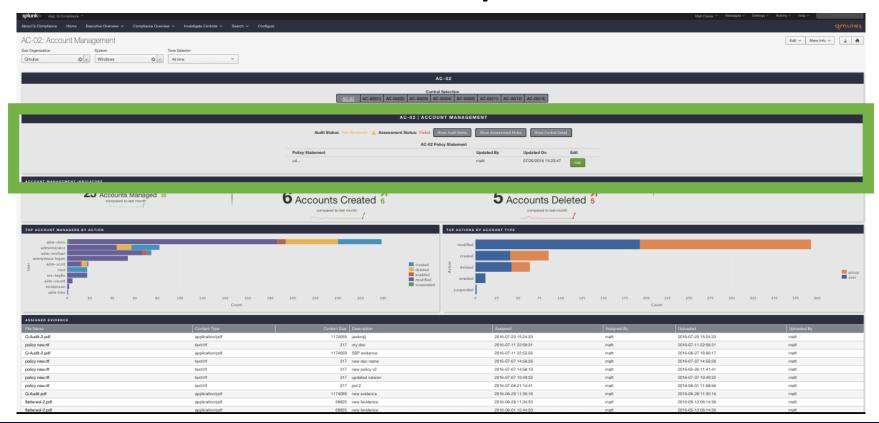
Technical Evidence



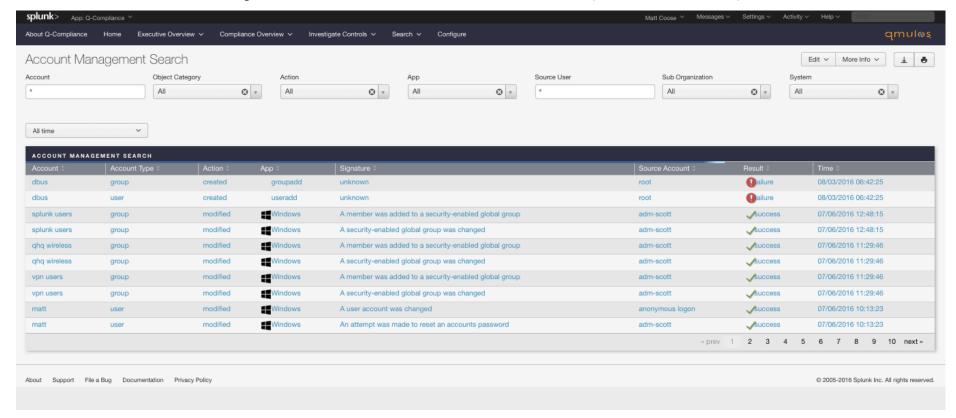
Technical Control Evidence In Machine Data

Evidence	Control Family	Data Source(s)
Monitoring use of information system accounts (creates, enables, modification, disables, and removes)	Access Control	AD, LDAP, Enterprise Authentication Sources
Monitoring information system audit events (type, timestamp, where, who, what, outcome, and the identity of any individuals or subjects)	Audit & Accountability	Operating Systems, Printer logs, AD
Monitoring changes to the configuration settings from baselines	Configuration Management	Configuration, Patch, and Authenticated Scanners
Proof that information system implements multifactor authentication for network access to privileged accounts	Identification & Authentication	IAM Systems
Proof that the organization employs automated mechanisms for tracking security incidents and the collection and analysis of incident information	Incident Response	Incident tracking system, SIEMs
Proof that the organization [prohibits] the use of [USB drives] on [all systems]	Media Protection	DLP Solutions
Monitoring for extreme temperatures and humidity	Physical & Environmental Protection	IOT: Environmental Data Center Sensors

Human Activity Evidence



Dynamic Evidence (Search)



Technical Elements Of A Solution



Technical Elements

Data Sources

TAs/Tags/Event Types

Data Models/Pivots/KV Stores



Lessons Learned And Benefits



Lessons Learned

- Define your approach based on real pain points
- Set simple compliance automation goals to start
- Be smart about which control catalog(s) you select build once, report many
- Don't assume you know compliance
- Align to data models but extend
- Leverage TAs but adapt



Benefits

\$3.5 million is the average cost to achieve "compliance" for a large enterprise; however, the average cost for organizations that experience non-compliance-related problems is far higher -- \$9.4 million.¹

SEC Charges Investment Adviser With Failing to Adopt Proper Cybersecurity Policies Prior To Breach September 22, 2015 SEC Steps Up Cybersecurity Enforcement Tuesday, October 6, 2015

SEC Enforcement Lays out Approach to Cybersecurity Cases
Monday, February 22, 2016

SEC Preparing Cases against firms for lack of cybersecurity preparedness
April 8, 2016

Expensive to do manually and more expensive not to do it!

1. "The True Cost of Compliance", a 2011 Ponemon Institute research study

Other Benefits

- Reducing manual effort
- Reducing paperwork
- Increasing frequency of monitoring (ConMon)
- Technical insight
- Increasing flexibility
- Asking different questions of the same data sources multiplies ROI
- Enabling security!!

Use Case – Cloud Provider



Case Study – Cloud Provider

A provider of managed hosting services and data centers for information technology services and cloud computing with data centers in United States, the United Kingdom, and China.

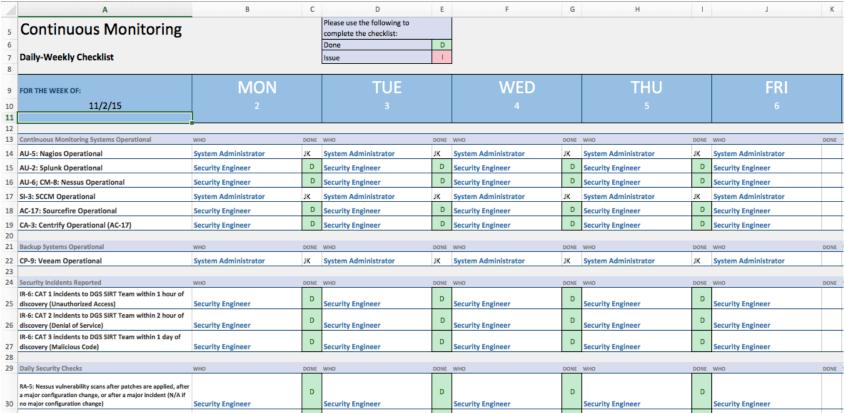
Compliance requirements span commercial and federal markets, with regulatory frameworks such as FedRamp, HIPAA, SOX, PCI

Initial focus: FedRamp Compliance

Timeline & Before State

- 2015 last year for FedRamp audits based on NIST SP 800-53r3
- 5 PM EST Monday, December 15th, 2015 Inbound call to Qmulos:
 "can you help us with FedRamp compliance?"
 - Answer: "Sure. Tell me about your infrastructure."
 - Response: "We use Splunk, ingest logs from what we think are all the relevant sources, but it takes about 2 months with the auditors reviewing consoles from each system and reviewing our manual checklists we use to demonstrate our monitoring audit trail. Want to see our spreadsheet?"

Spreadsheet Checklist For ConMon: Efficient?



How Did We Get Started?

- Audited existing manual spreadsheet of controls, evidence required,
 ConMon requirements, and data sources against NIST SP 800-53r4
 - A few new controls/enhancements same data sources
- Prioritized technical controls that required staff to monitor on a daily, weekly, monthly basis and needed evidence that this was being performed
 - mapped staff responsible & role to each control
- Installed required apps (in this case, Q-Compliance & Q-Audit), configured apps to map data sources to systems and controls

Timelines

- Kickoff, prioritization, basic setup
- System & 10 data source mappings
- User training
- Control page customization

- 1 week
- 4 days over week 2 & 3
- 2 days over week 2 & 3
- 2 weeks over week 3 & 4

Results

- Passed the audit
 - Tip for the audience start before the audit so that you can do an internal assessment and remediate in advance!
- Transitioned ConMon activities from multiple consoles for a range of users to a single console – and eliminated the spreadsheet

 Is there more to do? Yes – focus is continued automation and centralizing in one tool (Splunk) for additional controls (not just technical)

Use Case – Federal Agency



Case Study – Federal Agency

Small component of a large federal agency that manages a few systems critical to the whole agency

Proponent – agency Splunk Ninja – using free Splunkbase & internally created apps

Compliance requirements focused on FISMA based on NIST (800-53r4)

Limited staffing to support compliance & audit activities

Timeline & Before State

Using Splunk to monitor IT Ops of Mission focused systems

 Decided to prototype control monitoring from some of the same data sources to provide a monitoring view for system

 Support audits as a very manual process, leveraging multiple system consoles, documents & workflows in Sharepoint, Splunk

How Did We Get Started?

- Defined Project Goals
 - streamline audit support process
 - provide added value to system owners
 - support current Agency processes
 - provide a showcase for broader Splunk use cases in the Agency
- Gained support of HQ

Collaborated with SOC (evaluating Splunk ES for replacing legacy SIEM)

How Did We Get Started?

- Defined systems based on who could mitigate or accept the associated risks we would identify
 - Physical controls data center team
 - Authentication AD team
 - Configurations Configuration management team
 - Agency Mission Systems System Owner
- Installed required apps, configured apps to map data sources to systems and controls
- Identified key workflows (Sharepoint) for support

Results

 Implemented and did compliance configuration over a period of weeks based on current data sources for technical controls

Dashboards now being viewed by system owners and others – for some, this
is their first access to this level of real time compliance posture ala ConMon –
new proponents for Splunk that had not be exposed to it before

 Performed and scored our first internal assessment - identified key weaknesses to be remediated

Questions?

Demo Time!!

- Qmulos Premium Apps
 - Enterprise Compliance
 - Enterprise Audit

Find us on SplunkBase at:

https://splunkbase.splunk.com/apps/#/page/1/search/qmulos/order/relevance

THANK YOU

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Demo Slides



About Q-Compliance

QMULOS ENTERPRISE COMPLIANCE (Q-COMPLIANCE)

Compliance to Enable Security

Automated compliance through continuous assessment



EXECUTIVE

About Q-Compliance Organization Overview Enterprise Opportunities POAM Overview



COMPLIANCE OVERVIEW

Family Overview Control Overview



INVESTIGATE CONTROLS

Access Control Awareness and Training Audit and Accountability Security Assessment and Authorization Configuration Management Contingency Planning Identification and Authentication Incident Response Maintenance Media Protection





CONFIGURATION

Configuration Page



ABOUT QMULOS

Compliance Overview >

About Q-Compliance

Holistic Security Solutions

Qmulos is based in the Washington DC technology corridor. Our team has decades of proven compliance, cyber defense, and security research experience. We are focused on providing cost-effective automated compliance solutions, providing the foundation for securing the Enterprise. Qmulos is a proud Elite Splunk Partner.

Investigate Controls V

ABOUT Q-COMPLIANCE

Compliance to Enable Security

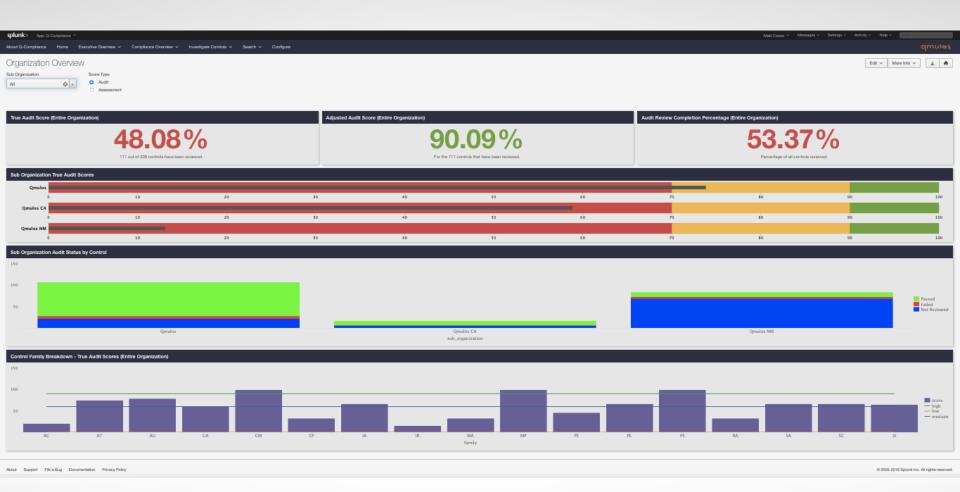
Compliance is not the end game for security conscious organizations – but we think it's a great way to start securing your organization. Our Q-Compliance App provides a clear roadmap for making your organization compliant with cybersecurity standards and enables you to pass even the most rigorous audits.

From the ground up, the App helps you identify how to properly instrument your networks and aggregate critical security data. Once you have visibility across these critical compliance domains, you can start working on getting those scores up, system by system, Division by Division, and even Enterprise-wide. This is the best way to truly understand and manage your cybersecurity risk.

As the one-stop-shop for your security data, Q-Compliance also sets the stage for security beyond compliance – which IS the end game for security conscious organizations.





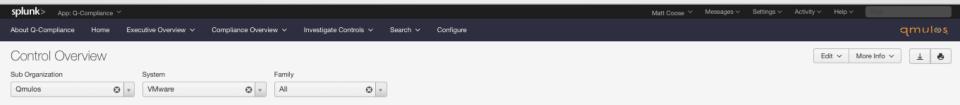






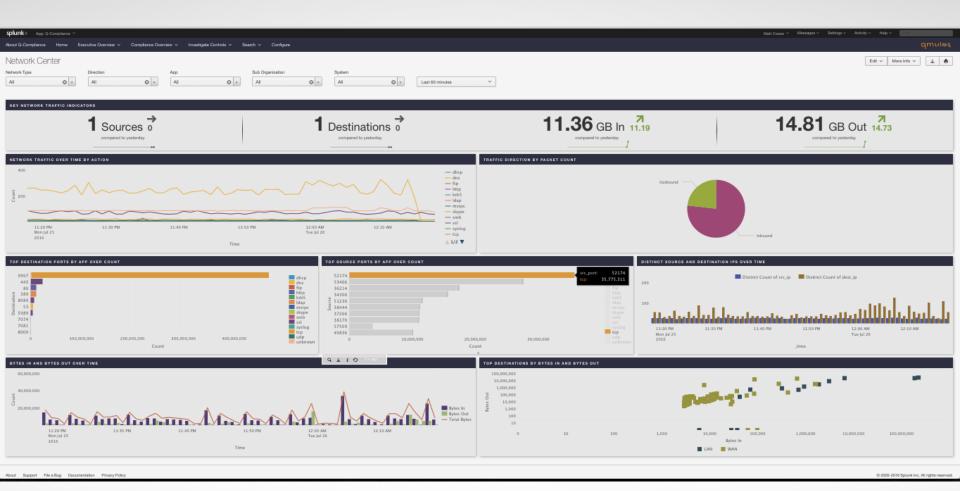
Family Scores (Qmulos, All Systems)								
Family 0	Name 0	True Audit Score 0	Adjusted Audit Score \$	Audit Percentage Reviewed 0	True Assessment Score 0	Adjusted Assessment Score 0	Assessment Percentage Reviewed ©	
1 AC	Access Control	78.57%	100.00%	78.57%	71.43%	76.92%	92.86%	
2 AT	Awareness and Training	71.43%	83.33%	85.71%	85.71%	100.00%	85.71%	
3 AU	Audit and Accountability	78.26%	100.00%	78.26%	78.26%	94.74%	82.61%	
4 CA	Security Assessment and Authorization	64.29%	81.82%	78.57%	71.43%	83.33%	85.71%	
5 CM	Configuration Management	100.00%	100.00%	100.00%	80.00%	100.00%	80.00%	
6 CP	Contingency Planning	0.00%	0.00%	0.00%	100.00%	100.00%	100.00%	
7 IA	Identification and Authentication	50.00%	100.00%	50.00%	100.00%	100.00%	100.00%	
8 IR	Incident Response	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
9 MA	Maintenance	50.00%	50.00%	100.00%	50.00%	50.00%	100.00%	
10 MP	Media Protection	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
11 PE	Physical and Environmental Protection	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
12 PL	Planning	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
13 PS	Personnel Security	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
14 RA	Risk Assessment	0.00%	0.00%	0.00%	100.00%	100.00%	100.00%	
15 SA	System and Services Acquisition	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
16 SC	System and Communications Protection	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	
17 SI	System and Information Integrity	68.18%	88.24%	77.27%	77.27%	89.47%		

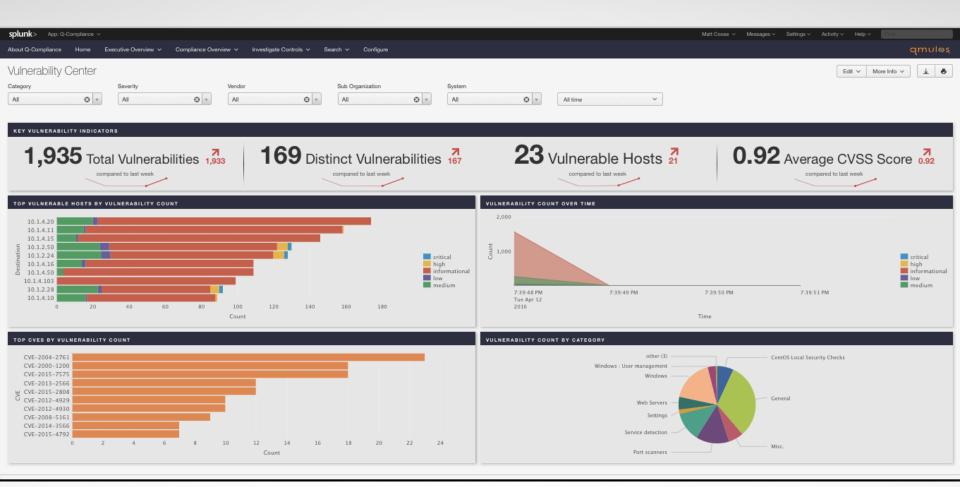
About Support File a Bug Documentation Privacy Policy

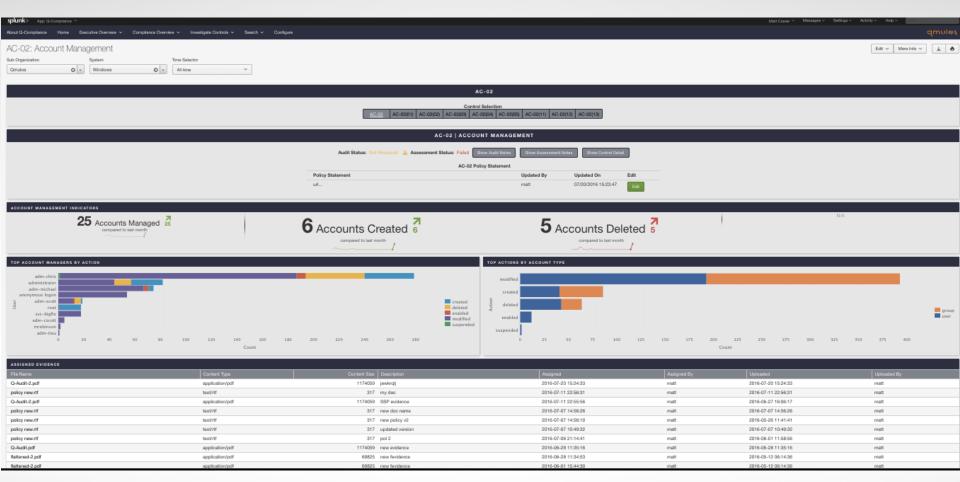


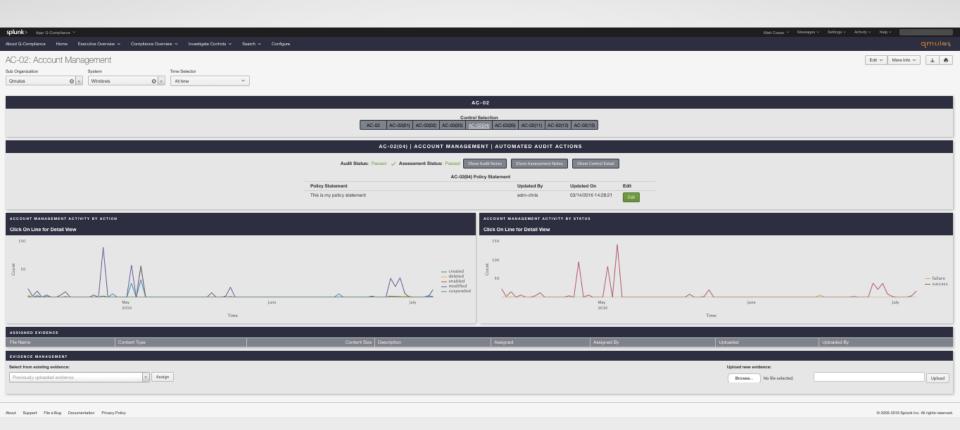
Control Scores (Qmulos, VMware, All Families)								
	Control 0	Name 0	Audit Status 0	Assessment Status :				
1	AC-21	Information Sharing	Passed	Failed				
2	AC-22	Publicly Accessible Content	Passed	Passed				
3	AT-03	Role-Based Security Training		Not Reviewed				
4	AT-04	Security Training Records	Failed	Passed				
5	AU-12(01)	Audit Generation System-Wide / Time-Correlated Audit Trail	Passed	Passed				
6	AU-12(03)	Audit Generation Changes by Authorized Individuals	Passed	Passed				
7	CA-08	Penetration Testing	Passed	Passed				
8	CA-09	Internal System Connections	Passed	Passed				
9	CM-10	Software Usage Restrictions	Passed	Passed				
10	CM-11	User-Installed Software	Passed	Passed				
11	CP-10(02)	Information System Recovery and Reconstitution Transaction Recovery		Passed				
12	CP-10(04)	Information System Recovery and Reconstitution Restore Within Time Period	Not Reviewed	Passed				
13	IA-08(03)	Identification and Authentication (Non-Organizational Users) Use of Ficam-Approved Products		Passed				
14	IA-08(04)	Identification and Authentication (Non-Organizational Users) Use of Ficam-Issued Profiles	Passed	Passed				
15	IR-07(01)	Incident Response Assistance Automation Support for Availability of Information / Support	Passed	Passed				
16	IR-08	Incident Response Plan	Passed	Passed				
17	MA-05(01)	Maintenance Personnel Individuals Without Appropriate Access	Failed	Failed				
18	MA-06	Timely Maintenance	Passed	Passed				
19	MP-07	Media Use	Passed	Passed				
20	MP-07(01)	Media Use Prohibit Use Without Owner	Passed	Passed				
				« prev 1 2 next »				

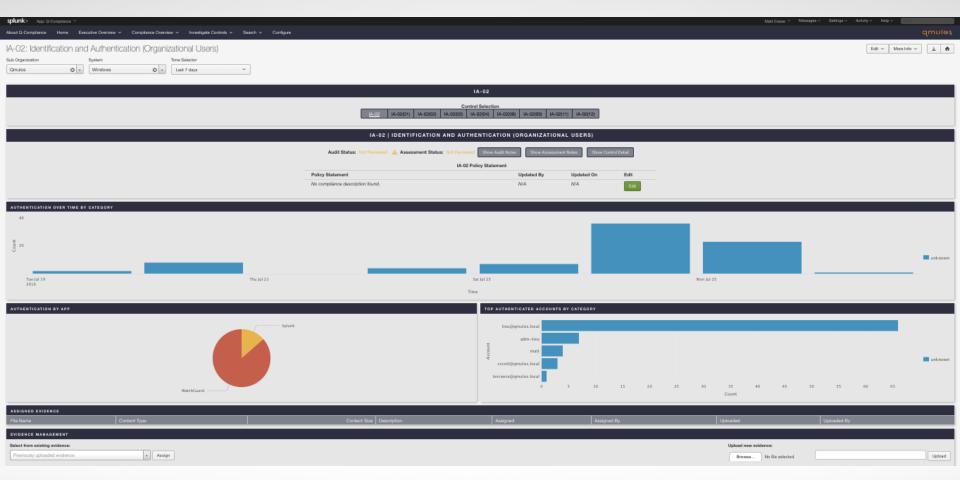












Best Practices

- 1 To many relationship of data to controls-streamline where possible and get creative in defining systems to handle risks
- Risk based approach can't mitigate everything but can show that you have a good grasp on what
 the risks actually are so you can mitigate, transfer, or accept that risk
- Assign risk to those who can mitigate or accept this can be done via system definitions and data source mapping
- Group controls by data source or function-like data center or physical or policy gets to inherited controls
- Tailor controls don't just accept baselines (H, M, L tailor as appropriate to fit the system and organization

Example Sources

- Windows Event Logs
- Linux Audit Logs
- Active Directory
- IBM Big Fix
- Tenable/Nessus
- Ticketing Systems

- Network Traffic
 - DNS/DHCP/FTP/HTTP
- IDS/IPS
- eGRC Tools
- Physical Access Readers...

TAs And Modifications

- Windows Add-on
- Splunk Add-on for *nix
- Splunk Add-on for Stream

- Qmulos Add-on for Linux
- " " Nessus
- " " Splunk
- " " Windows
- " " BitDefender
- " " Cisco
- " " R1Soft
- ""Stream
- " " WatchGuard…

Data Models And KV Stores

Flexibility is key

 Data models provide a common abstraction – enabling understanding across different data source events

KVs provide for organizational variable input (e.g. system names)

Compliance (RMF) And Security

RISK MANAGEMENT FRAMEWORK

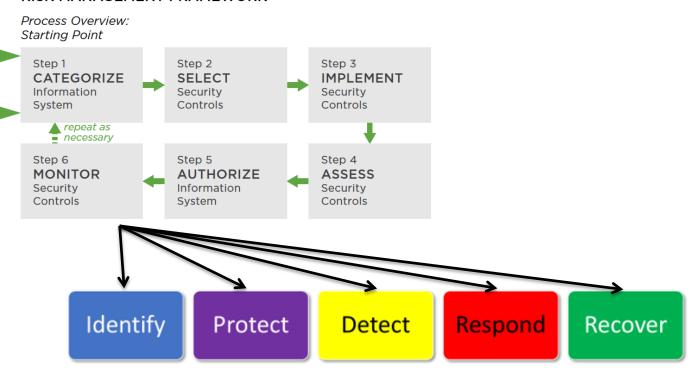
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(Source: Guide for Applying the Risk Management Framework to Federal Information System, NIST, Feb 2010)



Example Of "Manual" ConMon Evidence

	A	В	С	D	E	F	G	Н	- I	1	K
5 Conti	nuous Monitoring			Please use the following to complete the checklist: Done	D						
7 Daily-We	ekly Checklist			Issue	-1]					
9 FOR THE WI	EEK OF:	MON		TUE		WED		THU		FRI	
10	11/2/15	2		3		4		5		6	
11											
12											
	Monitoring Systems Operational		DONE		DONE		DONE		DONE		DONE
14 AU-5: Nagio	•	System Administrator	JK	System Administrator	JK	System Administrator	JK	System Administrator	JK	System Administrator	
15 AU-2: Splun	k Operational	Security Engineer	D	Security Engineer		Security Engineer	D	Security Engineer	D	Security Engineer	_
16 AU-6; CM-8	: Nessus Operational	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
17 SI-3: SCCM	Operational	System Administrator	JK	System Administrator	JK	System Administrator	JK	System Administrator	JK	System Administrator	
18 AC-17: Sour	rcefire Operational	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
19 CA-3: Centri	ify Operational (AC-17)	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
20											
21 Backup Syste	ems Operational	WHO	DONE	WHO	DONE	WHO	DONE	WHO	DONE	WHO	DONE
22 CP-9: Veean	n Operational	System Administrator	JK	System Administrator	JK	System Administrator	JK	System Administrator	JK	System Administrator	
24 Security Incid	dont Boronda d										
-	ncidents to DGS SIRT Team within 1 hour of	WHO	DONE	WHO	DONE	WHO	DONE	WHO	DONE	WHO	DONE
	nauthorized Access)	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
IR-6: CAT 2 in discovery (De	ncidents to DGS SIRT Team within 2 hour of enial of Service)	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
27 discovery (M	ncidents to DGS SIRT Team within 1 day of lalicious Code)	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
28											
29 Daily Security	y Checks	WHO	DONE	WHO	DONE	WHO	DONE	WHO	DONE	WHO	DONE
	vulnerability scans after patches are applied, after turation change, or after a major incident (N/A if	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	D	Security Engineer	
no major conn	iguration change)	Security Engineer		Security Engineer		Security Engineer		Security Engineer		Security Engineer	+

THANK YOU



