FISMA and Metrics

Samuel A. Merrell, CISSP, GSEC

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# FISMA and Metrics

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Software Engineering Institute

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Some key audiences:

- National defense and intelligence community
- Federal civilian agencies
- Federal law enforcement
- Critical infrastructure protection
- Financial services industry
- Incident response teams with national responsibility
Survivable Enterprise Management

- Assist organizations in developing and implementing approaches to enterprise security management improvement
- Establish techniques and approaches for risk-based requirements elicitation and analysis
- Promote and transition OCTAVE self-directed security evaluation method
- Research the risks posed to information systems/organizations by insiders
- Improve security management capabilities through the development of an enterprise security management capabilities framework (Resiliency Engineering Framework or REF)

http://www.cert.org/work/organizational_security.html
Introduction to Metrics and Measurements

Spam

- Blocked as Spam: 18%
- Legitimate Email: 82%
Agenda

- Overview
- NIST Guidance
  - SP 800-55
  - SP 800-80
  - SP 800-55, Revision 1
- Intro to Process Maturity and CMMI
- Measurement and Analysis Process Area of CMMI
- Conclusion
Terms

**Measurement**- Information that is generated by counting things.

“It is 95 degrees”

**Metric**- Information that is derived through analysis that is applied to measurements

“Today was the hottest day of the year”

“Metrics 101” presentation by Elizabeth A. Nichols, CTO ClearPoint metrics, May 2006
Why Are We Discussing Metrics and Measurements?

Information Security Metrics, when done well:

- Enables better decision making
- Indicates program performance, both good and bad
- Justifies resource allocation
- Gauges control implementation
- Provides evidence of risk management
- Eases reporting efforts
  - FISMA
- “Demonstrates management commitment” – NIST SP 800-55
What is a “Good Metric?”

- A Good Metric is a consistent standard for measurement. It should have the following characteristics:
  - Consistently measured
  - Cheap to gather
  - Expressed as a number or percentage
  - Expressed using at least one unit of measure”¹
  - Relevant²

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² “Metrics 101” presentation by Elizabeth A. Nichols, CTO ClearPoint metrics, May 2006
Your organization **is not ready for a metrics program** if:

You do not have:

- A clear, formal understanding of your goals
  - Strategic Plans
  - Policies
  - Procedures
  - Guidelines
- Existing, repeatable processes
- Open lines of communication with stakeholders
Overview of the Federal Information Security Management Act (FISMA)
Federal Information Security Management Act

TITLE III—INFORMATION SECURITY

SEC. 301. INFORMATION SECURITY.

“SUBCHAPTER III—INFORMATION SECURITY

“§ 3541. Purposes

“The purposes of this subchapter are to—

“(1) provide a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets;”
CERT

NIST Guidance
Special Publication 800-55
“Security Metrics Guide for Information Technology Systems”

- Released in July 2003
- Originated from GISRA compliance workshops in 2002
SP 800-55 “Security Metrics Guide for Information Technology Systems” – Purpose

- Intended to guide the development, selection, and implementation of system level metrics.
- IT Security Metrics are designed to:
  - Facilitate decision making
  - Improve performance and accountability
- Mapped metrics to NIST SP 800-26 critical elements
SP 800-55 “Security Metrics Guide for Information Technology Systems” – Purpose

• SP800-55 is designed to help an organization:
  • Identify the adequacy of existing controls, policies, and procedures
  • Decide where to invest resources
  • Identify and evaluate nonproductive controls
  • Develop and implement metrics
  • Adequately justify security investments
  • Satisfy FISMA requirements to state performance measures for past and current fiscal years

“Implementation of an IT Security Metrics program will demonstrate agency commitment to proactive security.”

Security Metrics Program Structure

- Results-Oriented Metrics Analysis
- Quantifiable Performance Metrics
- Practical Security Policies & Procedures
- Strong Upper-Level Management Support
Upper level management support is critical
Practical policies need to be backed by authority
Metrics must be based on goals and objectives
Emphasize consistent periodic review of data

“The success of an information security program implementation should be judged by the degree to which meaningful results are produced.”

Success Factors:

1. Organizational Consideration
   - Stakeholders part of program development and implementation

2. Manageability
   - Organizations should prioritize measurement requirements
   - Ensure that a limited number of metrics are gathered (10-15)

3. Data Management Concerns
   - Standardized methods for metrics data collection and reporting
Metrics must:

• Be based on IT Security goals and objectives
• Yield quantifiable information

Data must:

• Be readily obtainable

The processes must:

• Be measurable
Metrics Development establishes the initial set of metrics

**Two Major Activities:**

1. Identification and development of current IT Security Program
2. Development and selection of specific metrics that measure:
   - **Implementation** of controls
   - **Efficiency** and **effectiveness** of controls
   - **Impact** of controls

Metrics Development Process

1. Stakeholders and Interests
2. Goals and Objectives
3. Information Security Policies, Guidelines, & Procedures
4. Information Systems Security Program Implementation
5. Level of Implementation
6. Program Results
7. Business/Mission Impact

Identification and Definition

Goals/Objective Redefinition
Policy Update
Continuous Implementation

Measures Development and Selection

- Business Impact
  - Business Value gained or lost
  - Acceptable loss estimate
- Effectiveness/Efficiency
  - Timeliness of security service delivery
  - Operational results experienced by security program implementation
- Process Implementation
  - Implementation level of established security standards, policies, and procedures

Graphic from NIST SP 800-55

Stakeholder identification

Anyone within an organization

• Primary stakeholders
  • Agency Head
  • CIO
  • ISSO
  • System Owners

• Secondary stakeholders
  • CFO
  • Training
  • HR

Graphic from NIST SP 800-55

Goals and Objectives Definition

Expressed as high level policies and requirements, including:

- Clinger-Cohen Act
- Presidential Decision Directives
- FISMA
- NIST Special Publications

Graphic from NIST SP 800-55
IT Security Policies, Guidance, and Procedures

Organization specific documents define a baseline of security practices.

Identify:

- Prescribed practices
- Applicable targets of performance
- Detailed security controls for system operations and maintenance

System Security Program Implementation Review

Includes:

- System Security Plans
- POA&M documents
- Latest IG findings
- Risk assessments
- COOP plans
- C&A documents
- Training results

Graphic from NIST SP 800-55
Metrics Development and Selection

Metrics measure

- Process implementation
- Effectiveness
- Efficiency
- Mission Impact

Prioritize metrics based on:

- Their ability to facilitate security control implementation
- The ease of obtaining them
- Existing, stable processes
Establishing Performance Targets

Implementation Metrics

- Set at 100% completion of specific tasks

Efficiency, Effectiveness, and Impact

Performance Metrics

- Management needs to determine goals for performance
- Targets need to be reviewed and adjusted
An agency’s initial set of metrics must:

- Facilitate improvement of control implementation
- Use data that can realistically be obtained
- Measure stable, existing processes

Feedback Within the Metrics Development Process

- Metrics will facilitate an understanding of whether the security performance goals are appropriate

Metrics Program Implementation

1. Create Performance Baseline
2. Analyze Results
3. Identify Corrective Actions
4. Develop Business Case
5. Obtain Resources
6. Apply Corrective Action
7. Measure Performance

Graphic from NIST SP 800-55
Create Performance Baseline

Metrics Program Implementation Plan

- Intended audience
- Data collection, analysis, and reporting plan
- Inter- and intra- office coordination
- Creation and/or selection of tools
- Modification of any tools
- Metrics summary reporting formats

Analyze Results

Ensure that collected metrics are used to understand system security and identify improvement actions

- Collect data
- Consolidate data and store it
- Conduct a gap analysis
- Identify causes of poor performance
- Identify opportunities for improvement

Graphic from NIST SP 800-55

Identify Corrective Actions

Develop a roadmap how to close implementation gaps

- Determine the range of possible corrective actions for gaps
- Prioritize corrective actions based on risk (800-30)
- Select most appropriate corrective action
Develop Business Case and Obtain Resources

- Document mission objectives
- Determine the cost of the status quo as a baseline
- Document gaps between target performance and current state
- Estimate costs for each proposed alternative
- Characterize benefits
- Risk assessment on alternatives
- Prepare budget submission
- Assign resources

Apply Corrective Actions

“Second verse, same as the first!”
– Herman’s Hermits
Special Publication 800-80
“Guide for Developing Performance Metrics for Information Security”
SP 800-80 "Guide for Developing Performance Metrics for Information Security" - History

- Released as a public draft in May of 2006
- Intended to be a companion to SP 800-55
- Will not be released as a final version (superseded by 800-55R1)
SP 800-80 ”Guide for Developing Performance Metrics for Information Security” - Purpose

- Focuses on developing and implementing information security metrics for an information security program, linking information security performance to agency performance by leveraging agency strategic planning
- Performance metrics provide the means for tying information security activities to strategic goals
- Outlined an agency information security metrics program
- Based on the controls that were introduced in 800-53
800-55 guidance applies primarily to the development of metrics for individual systems

- Defines three types of metrics for individual systems
  - Implementation Metrics
  - Effectiveness and Efficiency Metrics
  - Impact Metrics

800-80 guidance applies to an information security program

- Describes two ways of developing metrics at the program level
Control-Specific Approach
- Mapped to an individual 800-53 control
- Implementation metric

Cross-Cutting Approach
- Based on more than one individual control or family
- Provide a broader view of the information security program
- Can map to goals and objectives related to performance
SP 800-80 “Guide for Developing Performance Metrics for Information Security” Control-Specific Candidates

- Percentage of system users that have received basic awareness training (AT-4)
- Percentage of information security personnel who have received security training (AT-4)
- Average frequency of audit records review for analysis for inappropriate activity (AU-6)
- Percentage of audit log findings reported to appropriate officials (AU-6)
- Percentage of systems that are compliant with the baseline configuration (CM-2)
- Percentage of new systems that completed C&A prior to implementation (CA)
SP 800-80 ”Guide for Developing Performance Metrics for Information Security” Cross-Cutting Candidates

- Percentage of SP 800-53 Control Families for which policies exist
- Percentage of employees who have signed an acknowledgement that they have read the policies
Break
SP 800-55, Revision 1
SP 800-55, Revision 1 “Performance Measurement Guide for Information Security” - History

- Draft released in September, 2007
- Supersedes both 800-55 and 800-80
SP 800-55, Revision 1 “Performance Measurement Guide for Information Security” Purpose

• Purpose is to assist in the development, selection, and implementation of measures to be used at the information system and program levels

• Still focuses on SP 800-53’s Control Families, but states that the guidance can be used to develop agency-specific measures related to security controls not included in 800-53

• Inherits elements of both 800-55 and 800-80

• Reflects NIST’s increased focus on enterprise information security programs.
SP 800-55, Revision 1 “Performance Measurement Guide for Information Security” New Vocabulary

Measures - the results of data collection, analysis and reporting
Information security measures monitor the accomplishment of goals and objectives by:

- Quantifying implementation, efficiency, and effectiveness of security controls
- Analyzing the adequacy of program activities
- Identify possible improvement actions

Measures must:

- Yield quantifiable information (percentages, numbers)
- Involve easily obtainable data
- Provide relevant performance trends over time
SP 800-55, Revision 1 “Performance Metrics Guide for Information Security” - Benefits of Measures

- Increased accountability
- Improved information security effectiveness
- Demonstrate compliance and commitment
- Provide Inputs for resource allocation
SP 800-55, Revision 1 “Performance Metrics Guide for Information Security” - Types of Measures

Implementation measures - used to demonstrate progress in implementing information security programs, specific security controls, and associated policies and procedures

- Percentage of systems with approved System Security Plans
- Percentage of systems with a standard configuration
Efficiency/Effectiveness Measures - monitor results of security control implementation.

- Percentage of enterprise operating system vulnerabilities for which patches have been applied or that have been otherwise mitigated
- Percentage of incidents caused by improperly configured access controls

These measures address not only the result of control implementation, but the timeliness of the control
Impact Measures - combine information about the implementation of controls with information about resources

- Cost Savings
- Public Trust
- Mission-related impacts

Percentage of the agency’s information system budget devoted to information security

Percentage of E-Gov security and Privacy milestones met

Percentage of remote access points used to gain unauthorized access

Percentage of FISP 199 moderate and high impact systems that have successfully tested contingency plans within the past year
A Very Brief Introduction to Process Maturity and CMMI
A brief introduction to process maturity and the CMMI\textsubscript{1}

- Premise- The quality of a system is highly influenced by the quality of the process used to acquire, develop, and maintain it.
- Process improvement increases product and service quality as organizations apply it to achieve their business objectives.
- Process improvement objectives are aligned with business objectives.
A Brief Introduction to Process Maturity and the CMMI<sub>2</sub>

CMMI Benefits

The CMMI Product Suite is at the forefront of process improvement because it provides the latest best practices for product and service development and maintenance. CMMI best practices enable organizations to do the following:
A Brief Introduction to Process Maturity and the CMMI₃

- More explicitly link management and engineering activities to their business objectives
- Expand the scope of and visibility into the product lifecycle and engineering activities to ensure that the product or service meets customer expectations
- Incorporate lessons learned from additional areas of best practice (e.g., measurement, risk management, and supplier management)
- Implement more robust high-maturity practices
- Address additional organizational functions critical to their products and services
- More fully comply with relevant ISO standards
Embracing a process view

- Improvement in meeting resiliency goals is dependent on the active management and measurement of the process
- Process maturity increases capability for meeting goals and sustaining the process
- “Are we resilient?” or “Are we secure?” is answered in the context of goal achievement rather than what hasn’t happened
- Facilitates meaningful, purposeful selection and implementation of practices
Process Areas

22 in CMMI 1.2

Grouped into four sets:

- Process Management
- Project Management
- Engineering
- Support

Measurement and Analysis are one Process Area
Processes Areas, Goals, and Practices

Generic Goals (GG)

Process Area (PA)

Specific Goals (SG)

Specific Practices (SP)
CMMI Measurement and Analysis Process Area
Measurement and Analysis Process Area

**Purpose** - develop and sustain a measurement capability that is used to support management information needs.

The measurement and analysis process area involves:

- Specifying the objectives of measurement and analysis such that they are aligned with identified information needs and objectives
- Specifying the measures, analysis techniques, and mechanisms for data collection, data storage, reporting, and feedback.
- Implementing the collection, storage, analysis, and reporting of the data
- Providing objective results that can be used in making Informed decisions, and taking appropriate corrective actions
Measurement and Analysis Process Area$_2$

When Measurement and Analysis is not done well …
Measurements are used inappropriately
Inappropriate measures can cause unintended behavior
Management is based on perception, rather than fact.
Measurement presentations may confuse rather than enlighten
Useless measures are collected
Measurement and Analysis Process Area $A_3$

SG1 Align Measurement and Analysis Activities
   SP1.1 Establish measurement objectives
   SP 1.2 Specify measures
   SP 1.3 Specify data collection and storage procedures
   SP 1.4 Specify analysis procedures

SG 2 Provide measurement results
   SP2.1 Collect measurement data
   SP 2.2 Analyze measurement data
   SP 2.3 Store data and results
   SP2.4 Communicate results
Measurement and Analysis Process Area
Specific Goal 1: Align Measurement and Analysis Activities

The Specific Practices listed under Specific Goal 1 may be addressed concurrently or in any order.

Measurement objectives and activities are aligned with identified information needs and objectives.

SP 1.1 Establish measurement objectives
SP 1.2: Specify measures
SP 1.3: Specify data collection and storage procedures
SP 1.4: Specify analysis Procedures
Measurement and Analysis Process Area
Specific Practice 1.1 Establish Measurement Objectives

Establish and Maintain measurement objectives that are derived from identified information needs and objectives

Ask yourself what question you are answering with the data, why you are measuring something, and how these measurements will affect behavior.

Activities:

• Document information needs and objectives
• Prioritize information needs and objectives
• Document, review, and update measurement objectives
• Provide feedback for refining and clarifying information needs and objectives as necessary
• Maintain traceability of measurement objectives to the identified information needs and objectives
Measurement and Analysis Process Area
Specific Practice 1.2: Specify Measures

Specify measures to address the measurement objectives

**Base measure** - obtained by direct measurement

- Ex: estimates and actual measures of effort and cost (number of person-hours)

**Derived Measures** - combine two or more base measures

- Usually expressed as ratios or other aggregate measures.

Activities include:

- Identify candidate measures based on documented measurement objectives
- Identify existing measures that already address the measurement objectives
- Specify operational definitions for the measures
- Prioritize, review, and update measures
Measurement and Analysis Process Area
Specific Practice 1.3: Data Collection and Storage Procedures

Specify how measurement data will be obtained and stored

Ensuring appropriate accessibility and maintenance of data integrity are two key concerns related to storage and retrieval.

Activities:

- Identify existing sources of data that are generated from current work products
- Identify measures for which data are needed, but are not currently available
- Specify how to collect and store the data for each required measure
- Create data collection mechanisms and process guidance
- Support automatic collection of data where appropriate and feasible
- Prioritize, review, and update data collection and storage procedures
- Update measures and measurement as necessary
Measurement and Analysis Process Area
Specific Practice 1.4: Specify Analysis Procedures

Specify how measurement data will be analyzed and reported

Activities:

- Specify and prioritize the analysis that will be conducted and the reports that will be prepared
- Select appropriate data analysis methods and tools
- Specify administrative procedures for analyzing the data and communicating the results
- Review and update the proposed content and format of the specified analyses and reports
- Update measures and measurement objectives as necessary
- Specify criteria for evaluating the utility of the analysis results and for evaluating the conduct of measurement and analysis activities
Measurement and Analysis Process Area
Specific Goal 2: Provide Measurement Results

SG 2 Provide Measurement Results
   SP2.1 Collect measurement data
   SP 2.2 Analyze measurement data
   SP 2.3 Store data and results
   SP2.4 Communicate results
Measurement and Analysis Process Area
Specific Goal 2: Provide Measurement Results

Measurement results, which address identified information needs and objectives, are provided.

Measurement results can:

• Monitor performance
• Fulfill contractual obligations
• Fulfill regulatory requirements
• Help make informed management and technical decisions
• Enable corrective actions to be taken
Measurement and Analysis Process Area
Specific Practice 2.1 Collect Measurement Data

Obtain specified measurement data

Activities:

• Obtain the data for base measures
• Generate the data for the derived measures
• Perform data integrity checks as close to the source of the data as possible
Measurement and Analysis Process Area
Specific Practice 2.2 Analyze Measurement Data

Analyze and interpret measurement data

Activities

• Conduct initial analyses, interpret results, and draw preliminary conclusions
• Conduct additional measurement and analyses as necessary, and present results
• Review the initial results with relevant stakeholders
• Refine criteria for future analyses
Measurement and Analysis Process Area
Specific Practice 2.3: Store Data and Results

Manage and store measurement data, specifications, and analysis results

- Information stored typically includes:
  - Measurement Plans
  - Specifications of measures
  - Sets of data that have been collected
  - Analysis reports and presentations

Activities:

- Review the data to ensure their completeness, integrity, accuracy, and currency
- Store the data according to the data storage procedures
- Make the stored contents available for use only by appropriate groups and personnel
- Prevent the stored information from being used inappropriately
Measurement and Analysis Process Area
Specific Practice 2.4 Communicate Results

Report results of measurement and analysis activities to all relevant stakeholders.

Activities:

- Keep relevant stakeholders apprised of measurement results on a timely basis
- Assist relevant stakeholders in understanding the results
Generic Goals

Perform the Specific Practices

Institutionalize the Managed Process

- Establish an organizational policy
- Plan the process
- Provide resources
- Assign responsibilities
- Train people
- Manage configurations
- Identify and involve relevant stakeholders
- Monitor and control the process
Generic Goals

- Objectively evaluate adherence
- Review status with high level management

Institutionalize a defined process
- Establish a defined process
- Collect improvement information

Institutionalize a quantitatively managed process
- Establish quantitative objectives for the process
- Stabilize subprocess performance

Institutionalize an optimizing process
- Ensure continuous process improvement
- Correct root causes of problems
“Lessons Learned” in measurement and metrics

- “Measurement is a consistent but flexible process that must be tailored to the unique information needs and characteristics of a particular organization.
- Decision makers must understand what is being measured.
- Measurements must be used to be effective.

A large number of measurement programs fail early in their inception, usually because they do not provide relevant information to user needs."

* “Making Measurement Work” Cheryl Jones, STSC Crosstalk
“Lessons Learned” in measurement and metrics

- “Recognize that implementation of a measurement program may take a long time and that management can have a short-term window. Therefore, plan to show some short-term successes before management change. Start small and build upon success.

- Pay close attention to privacy issues pertaining to who can see what portion of the data.

* “Experiences in Implementing Measurement Programs” W. Goethert, W. Hayes, Software Engineering Institute, 2001
  http://www.sei.cmu.edu/publications/documents/01.reports/01tn026.html
“Lessons Learned” in measurement and metrics

- “A good metric is based upon F.A.C.T. –
  - Flexible
  - Accurate
  - Context-sensitive
  - Transparent*

- Major obstacles that appear when implementing a program are a result of an unreliable process for defining what needs to be measured, when it needs to be measured, and how the results can be derived, communicated, and interpreted.*

Applying the Lessons

![Pie chart showing 18% Blocked as Spam and 82% Legitimate Email]

- Blocked as Spam: 18%
- Legitimate Email: 82%
Applying the Lessons

Our strategic Goal is “To improve electronic communications between employees and customers.” we achieve this through:

1. Ensuring the availability of our email infrastructure (uptime)
2. Providing protection against unwanted communications (viruses, spam, phishing)
3. Promoting responsible email communications (compliance, education)

Measures of Success:

- **Systems availability**
  - in 1st quarter, email infrastructure uptime = 89.5 days out of 90 days (99.4%)

- **Unwanted messages**
  - Total mail in 1st quarter = 15,690
  - Total messages blocked as “unwanted” = 12,915 (82%)

- **Promoting responsible communication:**
  - 100% outgoing messages have disclaimers
  - Web page tutorial “safe email communications” completed (100% implemented)
Summary and Conclusion

Information security measurement program needs:

• Strong management support
• Practical policies and procedures
• Quantifiable performance measures
• Results-oriented measure analysis

There are three types of information security metrics:

• Implementation
• Effectiveness/efficiency
• Impact
Summary and Conclusion

The maturity of an agency’s program will determine what type of metric it will find to be the most useful.

The metrics development process has seven phases:

- Identification of stakeholders
- Identification of goals and objectives
- Security policy and procedure review
- System security plan Implementation review
- Metrics development and selection
- Establishing performance targets
- Feedback and refinement
Summary and Conclusion

NIST SP 800-55 is the only issued guidance, and that focuses primarily on individual systems. SP 800-80 was released as a draft, and will not be issued as a final publication.

SP 800-55 R1 integrates 800-55 and 800-80, focusing not only on individual systems, but on enterprise information security management programs.

Due to the unique nature of metrics to their organization, there is no “one size fits all” solution, although the NIST documents have some suggestions to get programs started.

If the NIST approach is not the right one for your organization, there are other approaches, such as the CMMI.
Bibliography

- “Metrics 101” presentation by Elizabeth A. Nichols, CTO ClearPoint metrics, May 2006
- “Experiences in Implementing Measurement Programs” W. Goethert, W. Hayes, Software Engineering Institute, 2001 http://www.sei.cmu.edu/publications/documents/01.reports/01tn026.html
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For more information

Samuel A. Merrell, CISSP, GSEC, GGSC
Software Engineering Institute
Carnegie Mellon University

www.sei.cmu.edu
www.cert.org
smerrell@cert.org