

# Scope of an IT Compliance Audit



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# Introduction

- ❑ Audit comes in all sizes and shapes.
- ❑ Regardless of size, Audit represent a systematic and measurable assessment of the environment of an organization.
- ❑ Auditing for IT compliance is part of the ongoing process to ensure an organization is putting in place and maintaining effective security policies and controls.
- ❑ The audit makes use of various tools, but is primarily concerned with how the security policies are actually used.
- ❑ The IT environment is vast, and can be broken down into manageable and auditable chunks or domains.

# Must Do to be in Complia- nce

## □What Must Your Organization Do to Be in Compliance?

- Achieving compliance with external standards and regulations must be a first consideration in assembling a policy infrastructure.
- Being in compliance also means making sure the organization meets the expectations of the policy by enforcing the infrastructure put into place.
- An organization must consider current laws and industry standards along with the organization's mission.

# Must Do to be in Complia- nce

- **Organizational policies** provide general statements that address the operational goals of an organization. The role of information technology is to help accelerate the business.
- At the same time, consider security and compliance with laws and regulations to safeguard data. Specifically, IT and IT security policies provide the same high-level directives.
- This includes sensitive intellectual property of the organization and data that is commonly protected under privacy laws, such as personal information about individuals..

# Must Do to be in Complia- nce

- Complying with an organization's internal policy requires standards.
  - Internal standards describe mandatory processes or objectives that align with the goal of the policies.
  - Establishing both policies and standards is critical for ensuring the success of the organization as well as compliance with the myriad regulations with which organizations must comply.

# Must Do to be in Complia- nce

- A good starting place is with a solid organizational governance **framework**.
  - This framework considers the applicable laws and regulations and then sets the high-level requirements to secure and control the IT infrastructure.
  - Frameworks such as COBIT provide a blueprint for implementing high-level controls within an organization.
  - Further, control standards such as ISO/IEC 27002 and NIST 800-53 provide more specific security controls.

# Must Do to be in Complia- nce

- When policies and control framework are in place, organizations can start implementing **specific controls**.
  - Perhaps one of the greatest challenges is determining what specific controls to apply. Always consider what is reasonable and appropriate for your organization.
  - Too often, organizations spend too much time and money implementing controls that go beyond the requirements.
  - Many organizations may get compliance tunnel vision and they lose sight of really addressing risk, and are concerned only with being compliant.

# Must Do to be in Complia- nce

- ❑ Consider that organizations are often required to comply with many different regulations.
  - Many of these may have overlapping goals and intent. Therefore, you want to avoid chasing each one individually.
  - By having sound policies in place and a framework for the application of controls, you will be able to map existing controls to each regulation, including future regulations.
  - Thereafter, organizations perform a gap analysis to identify anything that is missing. A gap analysis is a comparison between the desired outcome and the actual outcome.

# Must Do to be in Complia- nce

- ❑ Compliance with internal policies and compliance with legal requirements should be closely tied together.
- ❑ Each of these can be divided into two high-level control objectives.
- ❑ Compliance with legal and regulatory requirements.
- ❑ Compliance with security policies and standards and technical compliance.

# Protecting and Securing Privacy Data

- In general, it is understood that **privacy data** must be protected. Depending on the environment in which an organization operates, privacy can take on different meanings
  - “the rights and obligations of individuals and organizations with respect to the collection, use, disclosure, and retention of personal information.” - AICPA
  - There are numerous methods used to protect privacy data.

# Protecting and Securing Privacy Data

- ❑ A privacy audit focuses on the following:
  - Which privacy laws apply to the organization?
  - Are the organizational responsibilities defined and assigned (for example, for the privacy officer and the legal department)?
  - Are policies and procedures for creating, storing, and managing privacy data applied and followed?
  - Are specific controls implemented, and are compliance tasks being followed? For example, is privacy data encrypted? Are there privacy statements and an opt-out mechanism on the organization's Web site?

# Designing and Implemen- ting Proper Security Controls

- Information security is largely about managing risk. That means IT controls are implemented depending on the risk they are designed to manage.
- The focus is on **mitigating risk** by implementing appropriate security controls, there are other ways to deal with risk.
  - I. Risk can be **Avoided**
  - II. Risk can be **Transferred**
  - III. Risk can be **Accepted**

# Designing and Implemen- ting Proper Security Controls



❑ Driving a vehicle poses many **risks**. Consider the risk of loss due to theft or an accident. Most people choose to **transfer the risk** by purchasing insurance. Others might **accept the risk** by not purchasing insurance. Still others might **avoid the risk** altogether by choosing not to drive.

# Designing and Implemen- ting Proper Security Controls

- Managing risks involves making tradeoffs.
- It is necessary to properly assess and prioritize risk.
- The process of selecting security controls needs to be part of an overall framework for risk management.

# Designing and Implemen- ting Proper Security Controls

- The following activities consider the implementation of controls within the context of such a framework:
  - I. Discover and classify data and information systems
  - II. Select security controls
  - III. Implement security controls
  - IV. Assess security controls
  - V. Authorize the controls
  - VI. Monitor the controls

# Designing and Implemen- ting Proper Security Controls

- Selecting security controls is best approached by first adhering to a common set of basic or baseline controls.
  
- You might need to apply additional controls that are specific to the system or application.

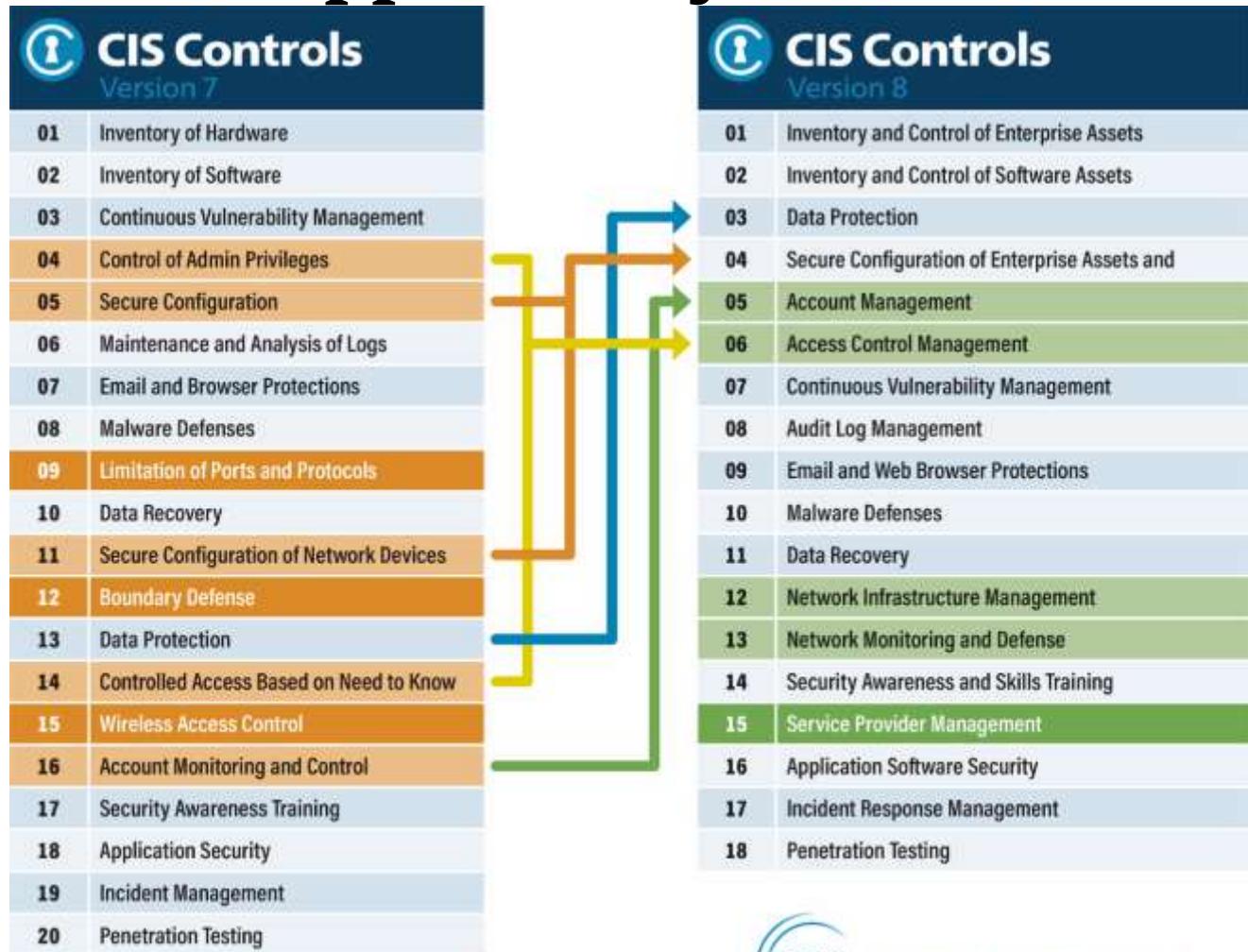
# Designing and Implemen- ting Proper Security Controls

□ Some common control baselines from the **NIST Standard 800-53**:

CONTROLS FAMILY	CONTROL EXAMPLES
Access Control	Account Management; Separation of Duties; Least Privilege
Awareness and Training	Security Awareness; Security Training; Training Records
Audit and Accountability	Audit of Record Retention; Auditable Events
Security Assessment and Authorization	Plan of Action and Milestones; Security Authorization
Configuration Management	Baseline Configuration; Configuration Change Control
Contingency Planning	Contingency Training; Alternate Storage Site
Identification and Authentication	Identifier Management; Cryptographic Module Authentication
Incident Response	Incident Handling; Incident Monitoring; Incident Reporting
Maintenance	Controlled Maintenance; Maintenance Tools
Media Protection	Media Access; Media Marking; Media Storage
Physical and Environmental Protection	Physical Access Controls; Visitor Control; Fire Protection
Planning	System Security Plan; Privacy Impact Assessment
Personal Security	Personnel Screening; Personnel Termination
Risk Assessment	Security Categorization; Vulnerability Scanning
System and Services Acquisition	Allocation of Resources; Security Engineering Principles
System and Communications Protection	Denial of Service Protection; Boundary Protection
System and Information Integrity	Malicious Code Protection; Spam Protection; Error Handling
Program Management	Enterprise Architecture; Risk Management Strategy

# Designing and Implemen- ting Proper Security Controls

□ Some Critical Security Controls from the CIS Supported by SANS:

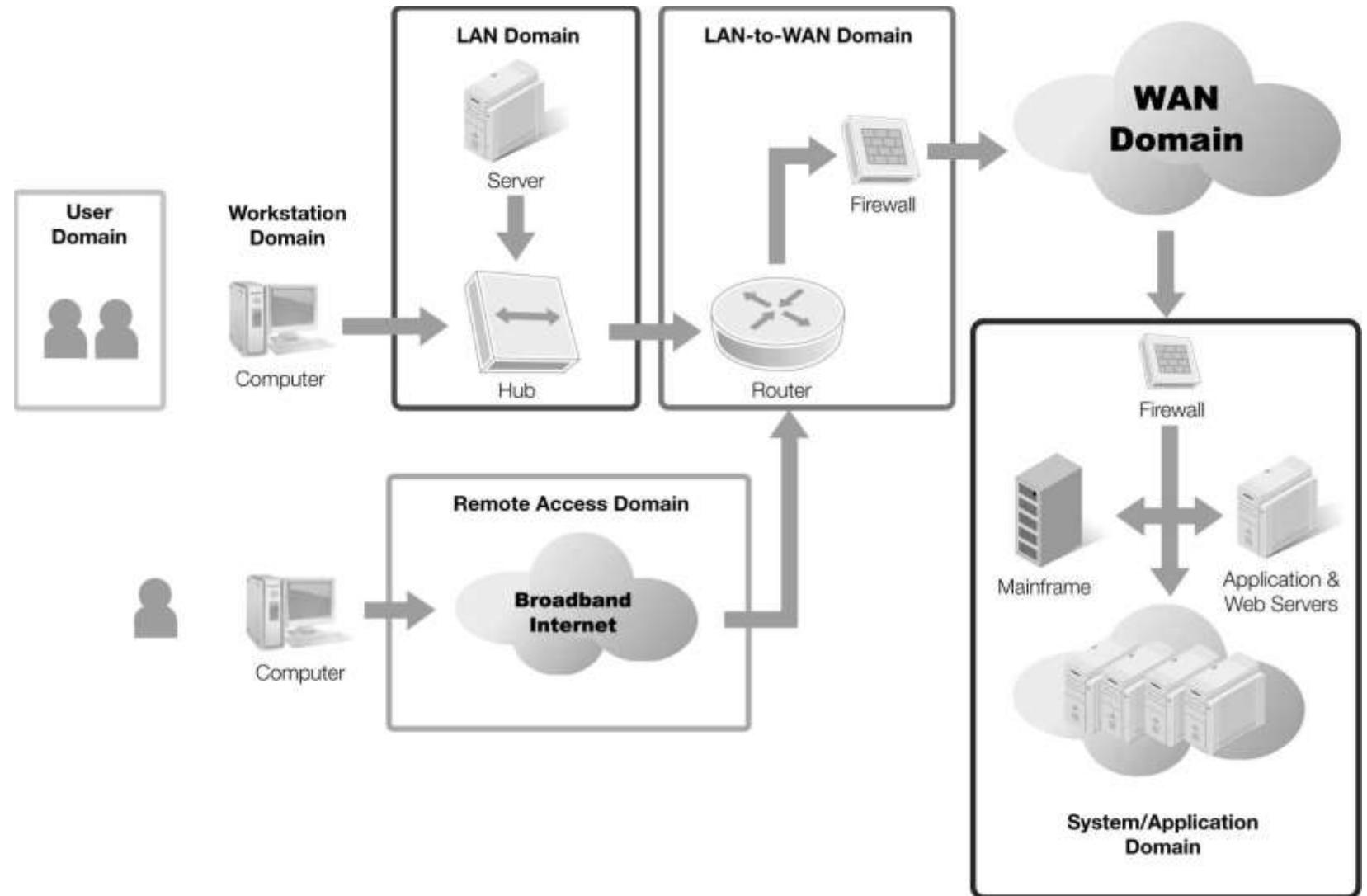


# Auditing Within the IT Infrastructure

- Across the infrastructure, an audit should focus primarily on the following three objectives:
  - I. Examine the existence of relevant and appropriate security policies and procedures.
  - II. Verify the existence of controls supporting the policies.
  - III. Verify the effective implementation and ongoing monitoring of the controls.

# Auditing Within the IT Infrastructure

## □ 7 Domains of IT Infrastructure:



# Auditing Within the IT Infrastructure

## □ 7 Domains of IT Infrastructure:

- I. **User Domain**—The end users of the systems, including how they authenticate into the systems.
- II. **Workstation Domain**—The end users' operating environment.
- III. **LAN Domain**—The equipment that makes up the local area network (LAN). A LAN is a computer network for communications between systems covering a small physical area.
- IV. **LAN-to-WAN Domain**—The bridge between the LAN and the wide area network (WAN). A WAN is a network that covers a large area, often connecting multiple LANs.

# Auditing Within the IT Infrastructure

- 7 Domains of IT Infrastructure:
- V. **WAN Domain**—The equipment and activities outside of the LAN and beyond the LAN-to-WAN Domain.
- VI. **Remote Access Domain**—The access infrastructure for users accessing remote systems.
- VII. **System/Application Domain**—Systems on the network that provide the applications and software for the users.

# Auditing Within the IT Infrastructure

- **User Domain:**
  - The User Domain covers the end users of information systems.
  - This includes not just employees but nonemployees as well, such as contractors and consultants.
  - This domain considers the roles and responsibilities of the users. It should examine all policies that relate to them—specifically, access policies by which the user authenticates to resources.
  - Acceptable use policy (AUP), System access policy, Internet access policy, E-mail policy

# Auditing Within the IT Infrastructure

- **Workstation Domain:**
  - The Workstation Domain comprises the desktop environment of an end user's computing environment and includes the following.
  - Desktop computers
  - Laptop computers
  - Printers
  - Scanners
  - Handheld computers and mobile devices
  - Modems
  - Wireless access points

# Auditing Within the IT Infrastructure

## □Workstation Domain:

- Each of these devices should be authorized to access and connect to the organizational network and information resources.
- An audit of this domain would also ensure proper procedures and controls around maintaining the system hardware and software defined by the policy and standard.
- Audit would take into consideration those security and configuration controls like standard operating system, patch management, anti malware, desktop firewall.

# Auditing Within the IT Infrastructure

## □ LAN Domain:

- A LAN is typically made up of computing and networking equipment in close proximity, such as a single room or building.
- LANs provide each computer on the network access to centralized resources, such as file servers and printers. Other elements like wiring, and networking equipment, such as hubs and switches.
- An audit of the LAN Domain can examine various elements, such as the following:
- Logon mechanisms and controls for access to the LAN
- Hardening and configuration of LAN systems
- Backup procedures for servers
- The power supply for the network

# Auditing Within the IT Infrastructure

## □ LAN to WAN Domain:

- A WAN can connect multiple LANs together with equipment like router or a firewall.
- The WAN Domain is considered an untrusted zone. The area between the trusted and untrusted zone, the LAN-to-WAN Domain, is protected with one or more firewalls. This is also called the boundary, or edge.
- Organizations should carefully manage the configurations of all devices in this domain, such as firewalls, routers, and intrusion detection systems.

# Auditing Within the IT Infrastructure

## □WAN Domain:

- A WAN can connect multiple LANs together this environment includes routers, firewalls, and intrusion detection systems, but also has many more telecommunications components.
- For many businesses, the WAN is the Internet.
- Internet to be attacked even if that just means it is scanned for open ports and vulnerabilities. A significant amount of security is required to keep hosts in the WAN Domain safe.

# Auditing Within the IT Infrastructure

## □ Remote Access Domain:

- The Remote Access Domain is made up of the authorized users who access organization resources remotely.
- Remote access solutions, such as a virtual private network (VPN), can create an encrypted communications tunnel over a public network such as the Internet.
- A common control applied to VPN authentication requires the use of two-factor authentication.

# Auditing Within the IT Infrastructure

## □ System/Application Domain:

- It is made up of the many systems and software applications that users access. This, for example, includes mainframes, application servers, Web servers, proprietary software, and applications.
- Like the desktop operating system, server operating systems should be hardened to authorized baselines and configured according to policies and standards with the appropriate controls.

# Maintaining IT Compliance

- ❑ Simply achieving compliance is not enough. Compliance is an ongoing process that should be treated as a continuous function within the organization.
- ❑ The following are primary examples of why organizations must maintain IT compliance as an ongoing program:
  - Organizations are dynamic, growing environments.
  - Threats evolve.
  - Laws, regulations, and industry standards continue to evolve, and new ones are introduced.
  - Many regulations require annual audits.

# Maintaining IT Compliance

□ Maintaining compliance requires a well-defined programmatic approach that involves processes and technology.

- Regular assessment of selected security controls
- Configuration and control management processes
- Change management processes
- Annual audit of the security environment

# Maintaining IT Compliance

- ❑ **Conducting Periodic Assessment:**
- ❑ Security assessments provide valuable metrics for maintaining compliance.
- ❑ In general, an assessment should address people, operations, applications, and the infrastructure throughout the organization.
- ❑ Generally, a security assessment is grouped into different types:
  - ❑ High-level security assessment - overall view
  - ❑ Comprehensive security assessment - targeted, concise
  - ❑ Preproduction security assessment - for new system prior to production.

# Maintaining IT Compliance

- ❑ **Creating an IT Security Policy Framework:**
- ❑ To maintain compliance, organizations should create a framework for IT security.
- ❑ A policy framework provides for a structured approach for outlining requirements that must be met.

# Maintaining IT Compliance

□ **Framework:** The framework starts on the top with very clear and concise objectives or requirements. A framework is a structured approach or system that provides the underlying structure for implementing policies, guidelines, and standards.

□ **Policy:** The policy regulates conduct through a general statement of beliefs, goals, and objectives. It provides a clear direction for decision-making and behavior, ensuring alignment with the organization's objectives and values.

- Users are required to use strong authentication when accessing company systems.

# Maintaining IT Compliance

**□Standard:** The standards are mandated activities or rules. It specifies the exact criteria or specifications to be met.

- Users are required to use two-factor authentication when accessing the remote network, combining a physical one-time token code with a personal identification number.

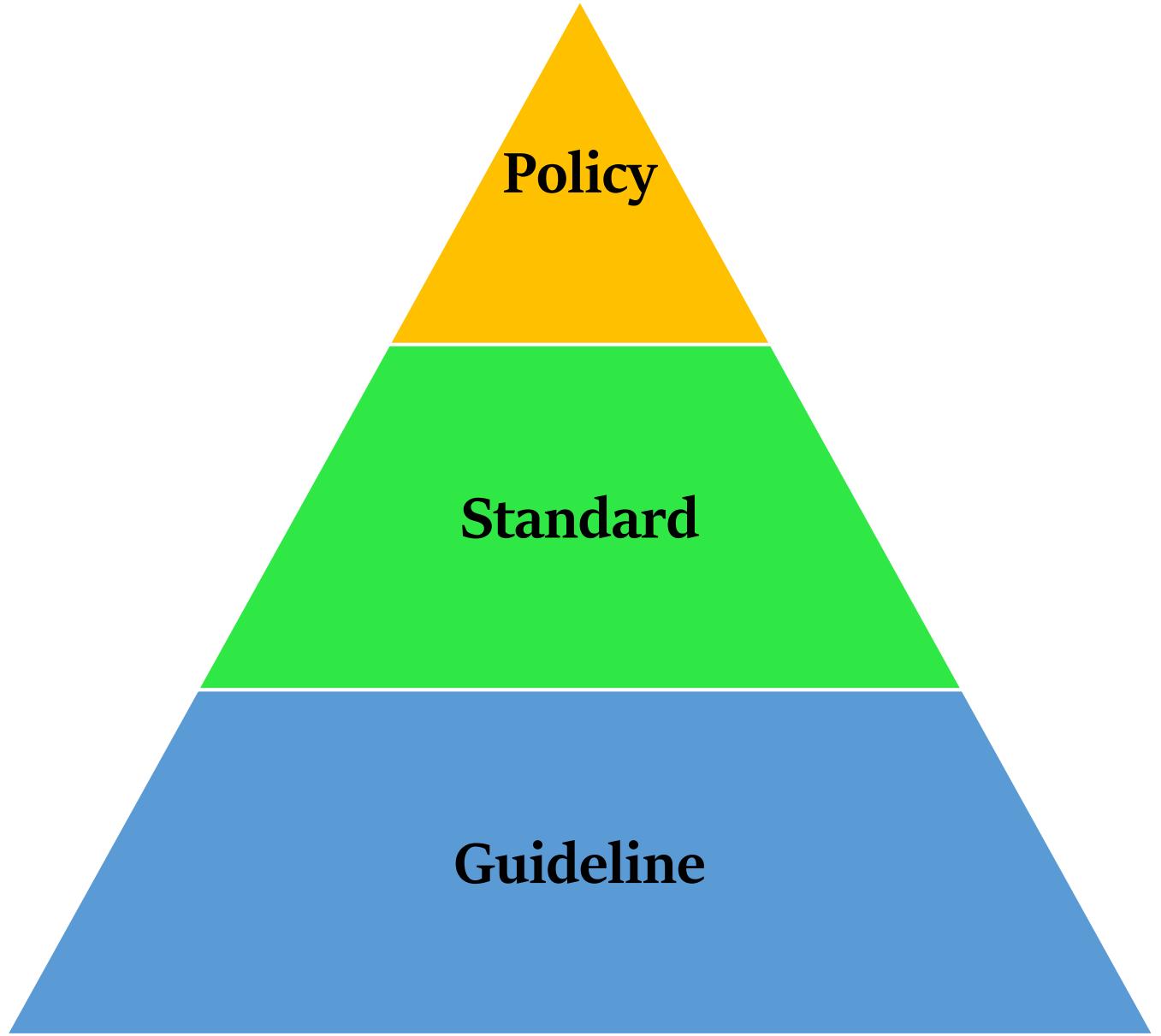
**□Guideline:** Guidelines provide general statements of guidance, but are not mandatory. It offers recommended advice to help achieve the policy objectives.

- Always keep your token within your possession and be aware of your surroundings when entering your personal identification number.

# Maintaining IT Compliance

- ❑ **Procedure:** A procedure provides step-by-step instructions that support the policy by outlining how the standards and guidelines are put into practice.
  
- ❑ A framework might state, for example, that systems should be protected from unauthorized access.
- ❑ As a result, an organization develops several policies that pertain to enforcing authorized access to its systems. One such policy states that individuals are assigned unique user names and passwords for the system.
- ❑ In turn, a standard may dictate specific parameters—for example, usernames must follow the format of first initial preceded by last name and be at least eight alphanumeric characters.
- ❑ Finally, a procedure indicates how to apply the requirements on a particular system.

# Maintaining IT Compliance



# References

- [1] Weiss, M., & Solomon, M. G. (2015). Auditing IT infrastructures for compliance. Jones & Bartlett Publishers.
- [2] GIPHY gifs

# **Truth, Transparency and Tactics Are the Characteristics of a good Auditor**