

## First Step to Gain Access to the FPLS

To gain access to the FPLS, the first requirement is to submit an independent security assessment to OCSE so that we can determine compliance with the appropriate security measures.



#### Purpose of the Assessment

- Validate existing security controls and make a determination of a general security posture of an IT system.
- Provide detailed findings (if any) and recommendations to improve system security plans, procedures, and practices.
- Provide a line of defense in knowing the strengths and weaknesses of an organization's information system.
- Determine whether security controls in an information system are operating in accordance with federal requirements.

#### Acceptable Assessments

- Internal Revenue Service (IRS) Safeguard Review Report (SRR);
- Social Security Administration (SSA) Independent Verification and Validation (IV&V);
- A review conducted by an independent tribal auditing organization; or
- A review conducted by an independent auditing firm outside the tribal organization/agency.

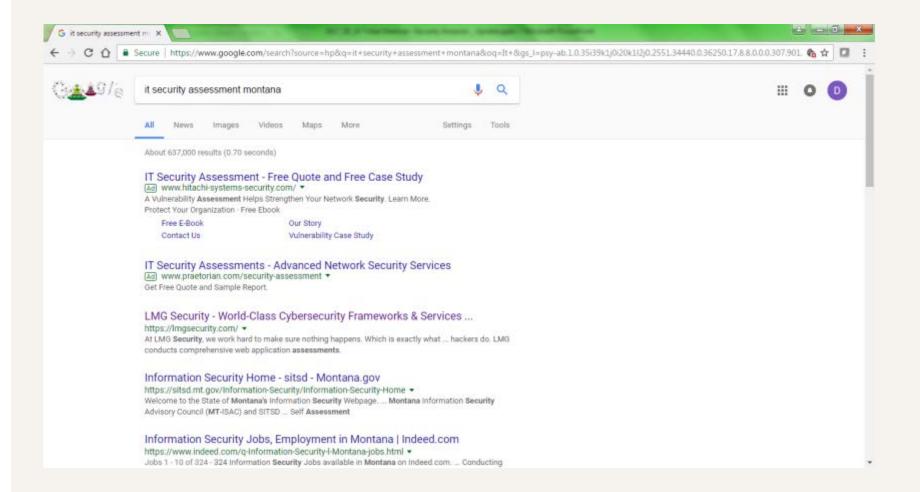
#### Qualifications of an Assessor

- An unbiased, outside entity.
- Competent independent evaluator, well versed in Information Assurance and IT cybersecurity technology, processes, and methodology.
- Use industry best practices and guidelines to conduct the security assessment (FISMA, NIST, OMB, IRS 1075).

#### What to Look for from Assessors

- Research various IT security companies in your area to determine if they are in the business of doing security control assessments.
  - Hint: Google searches are very effective in finding appropriate companies.
- Verify that the assessors have proper certifications/credentials.

#### Example: Google Search for Assessors



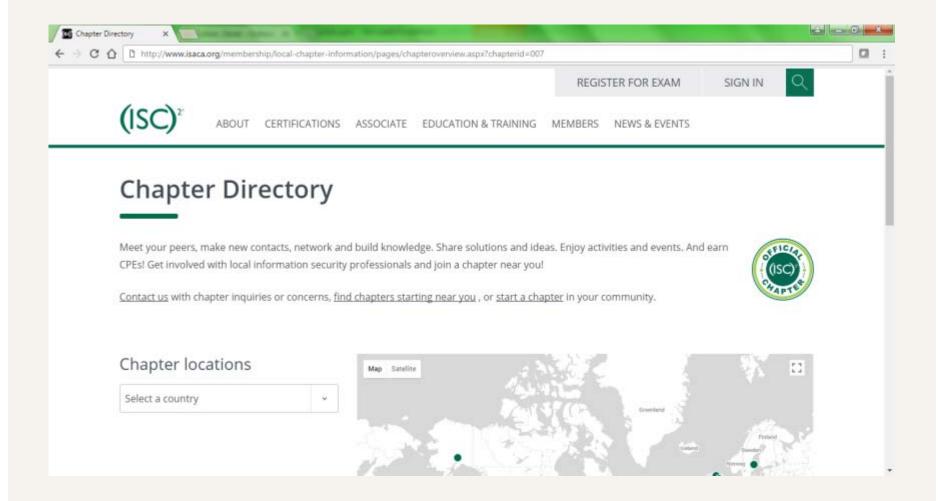
#### **Examples of Assessor Credentials**

- Certified Information Systems Security Professional (CISSP) CISSP recognizes
  information security leaders with the knowledge and experience to design, develop, and
  manage the overall security posture of an organization. CISSP Concentrations recognize
  CISSPs who expand their knowledge into specific subject matter areas such
  as architecture, engineering, and management.
- Certified Information Security Manager (CISM) The management-focused CISM is the globally accepted standard for individuals who design, build, and manage enterprise information security programs. CISM is the leading credential for information security managers.
- CompTIA Security+ This certification is globally trusted to validate foundational, vendor-neutral IT security knowledge, and skills. As a benchmark for best practices in IT security, this certification covers the essential principles for network security and risk management making it an important stepping stone of an IT security career.
- Certified Authorization Professional (CAP) This credential applies to those
  responsible for formalizing processes used to assess risk and establish security
  requirements and documentation. Their decisions will ensure that information systems
  possess security commensurate with the level of exposure to potential risk, as well as
  damage to assets or individuals.

# Examples of Agencies that Certify Systems Security Assessors

- International Information Systems Security Certification Consortium, Inc. (ISC<sup>2</sup>).
  - ISC<sup>2</sup> chapter locator:
     <a href="https://www.isc2.org/chapters/chapter-directory">https://www.isc2.org/chapters/chapter-directory</a>
- Information Systems Audit and Control Association (ISACA).
  - ISACA chapter locator:
     <a href="https://www.isaca.org/Membership/Local-Chapter-Information/Pages/default.aspx">https://www.isaca.org/Membership/Local-Chapter-Information/Pages/default.aspx</a>

#### ISC<sup>2</sup> Website



#### **ISACA** Website



## Why Security is So Important

- The goal of information security is to protect confidentiality, availability, and integrity.
- We have a duty to protect individuals' personal information that we collect—
  - To keep their personal identifying information (PII) safe from identity theft or privacy incident (breach);
  - To use data appropriately and only for the authorized purposes; and
  - To maintain data integrity and the public trust.

# The Tribal Security Agreement

- The Blanket Security Agreement developed by OCSE sets the minimum requirements that tribes must have in place to obtain FPLS data under the current laws, policies, and regulations.
  - It is meant to protect individuals' PII and maintain the data integrity of the NDNH and FCR.
  - It is a compilation of federally mandated protections that all partners that obtain data with OCSE must follow.
- It was drafted based on access approved for tribes and set forth statutorily.
- This security agreement is designed as a form that can be quickly modified as security and statutory requirements change. However, it may not be modified except through established OCSE processes.

#### The Changing Landscape

- The federal government has rules for data maintenance, security, and use that all agencies are required to follow.
- Partners who are authorized to obtain data must also comply with these federal requirements for security and privacy.
- Because security issues change as technology develops, the laws, rules, and policies may change as well.
- OCSE is required to comply with any laws, rules, and regulations affecting data security regardless of when they become effective. Therefore, this security agreement may be updated to address changes in processes or technologies, as well as new or revised federal security requirements and guidelines.
- OCSE will provide the tribal child support agency with written notification of any changes and require written assurance from the tribal child support agency that it shall comply with the new or revised security requirements.

## **Security Controls**

- Understanding your organization's security posture is extremely important in safeguarding data.
- Maintain security controls that are commensurate with the level of complexity of your IT system.
- System Security Plan (SSP), System Boundary, Network Segmentation, User Authentication/Access Controls, Vulnerability Management, Secure Configurations, Restrict Admin Privileges, Application Whitelisting, Patch Management, and Physical controls
- Defense in Depth coordinated use of multiple security countermeasures to protect the integrity of the information assets in an enterprise.
- Note: This is not an exhaustive list. When it comes to security MORE is BETTER.

# **Security Controls**

Security controls fall under 3 categories:

- <u>M</u>anagement
- Operational
- <u>Technical</u>

Referred to as the MOT security controls.

## **Security Controls**

- Management controls use planning and assessment methods to reduce and manage risk. Ex: Risk assessment, vulnerability assessment, etc.
- Operational controls help ensure that day-to-day operations of an organization comply with their overall security plan.
   People (not technology) implement these controls. Ex: Security Awareness training, Contingency Plan, etc.
- Technical controls use technology to reduce vulnerabilities. Ex: Firewall, Antivirus, etc.

## OCSE is Here to Help

Contact your OCSE Tribal Coordinators and OCSE Security Team if you need any assistance during this process.



#### **Contact Information**

Paige Hausburg – Tribal Coordinator

Paige.Hausburg@acf.hhs.gov

202-401-5635

LaShawn Scroggins - FPLS Access Coordinator

LaShawn.Scroggins@acf.hhs.gov

202-260-4524

Karol Nangosia - Security Team Lead

Karol.Nangosia@acf.hhs.gov

202-401-5456

Derek Cullum – Security Engineer

Derek.Cullum@acf.hhs.gov

202-690-0029

# Questions???

