



# Open Security Controls Assessment Language (OSCAL) Assessment Plan Assessment Results Plan of Action and Milestones

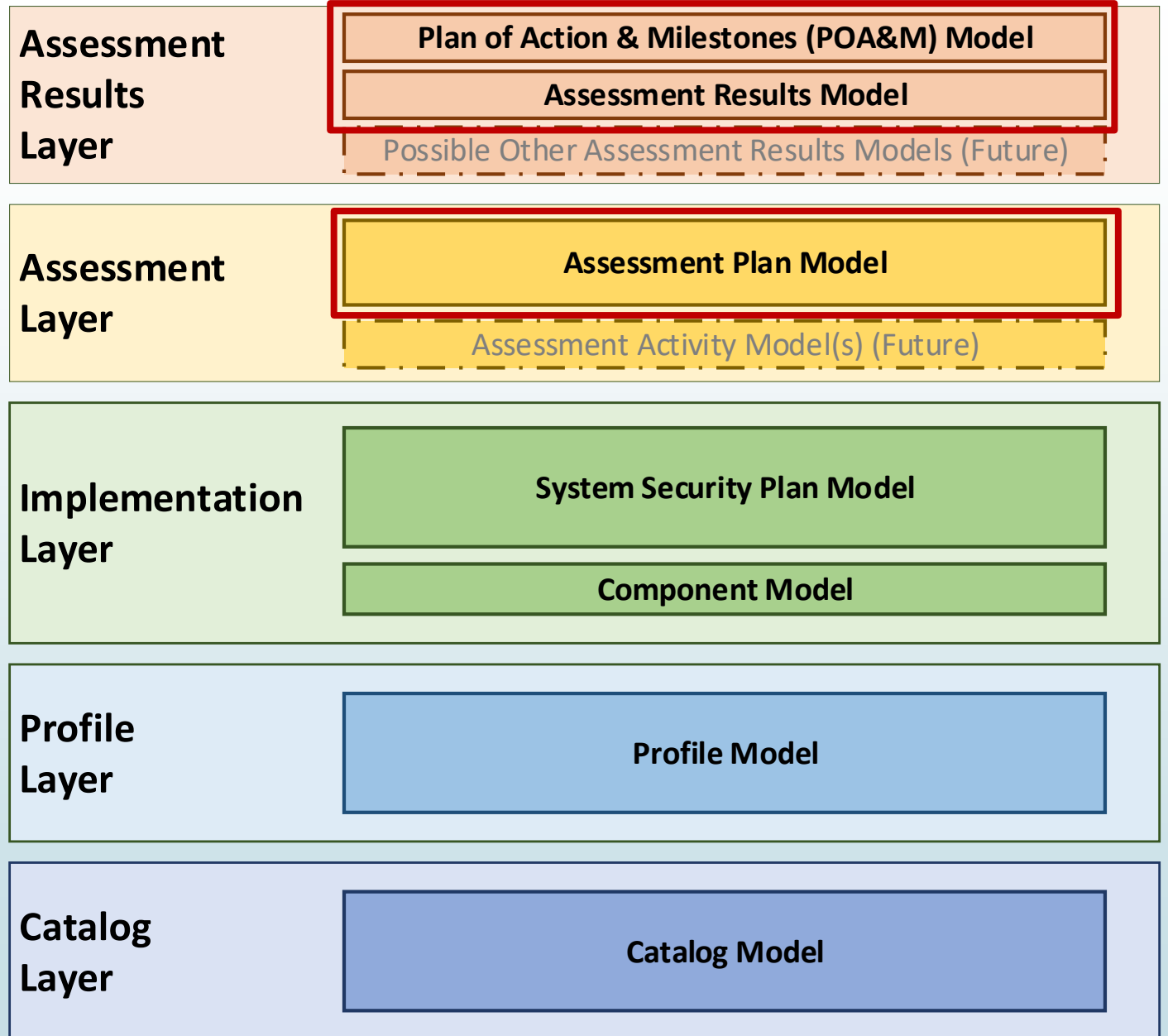
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National Institute of Standards and Technology

# Overview

## Three New Models:

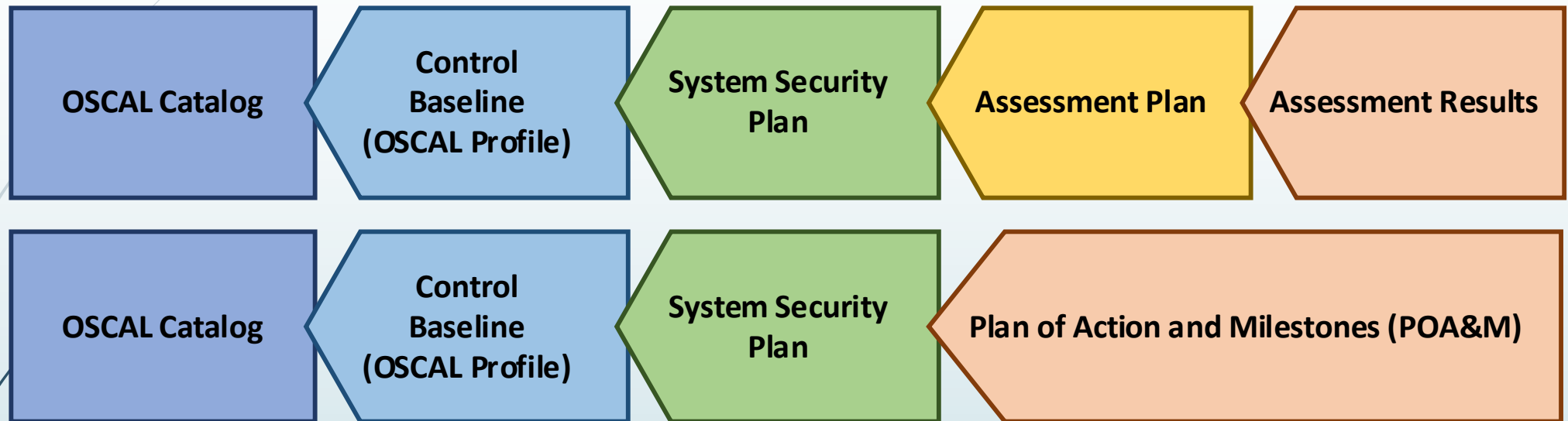
- Assessment Plan
- Assessment Results
- Plan of Action and Milestones



# Background

- ▶ Assessment Layers were intended to be addressed in OSCAL 2.0
- ▶ FedRAMP has an immediate need to receive a complete ATO package in OSCAL
- ▶ NIST and FedRAMP agreed to expand OSCAL now to enable OSCAL modeling of FedRAMP SAP, SAR, and POA&Ms
- ▶ Developed these with FedRAMP as the focus, but also in anticipation of other uses, such as continuous assessment
- ▶ Additional assessment layer features will still be addressed in OSCAL 2.0, such as additional mechanism to automate assessment inspections and testing.

# Importance of Import

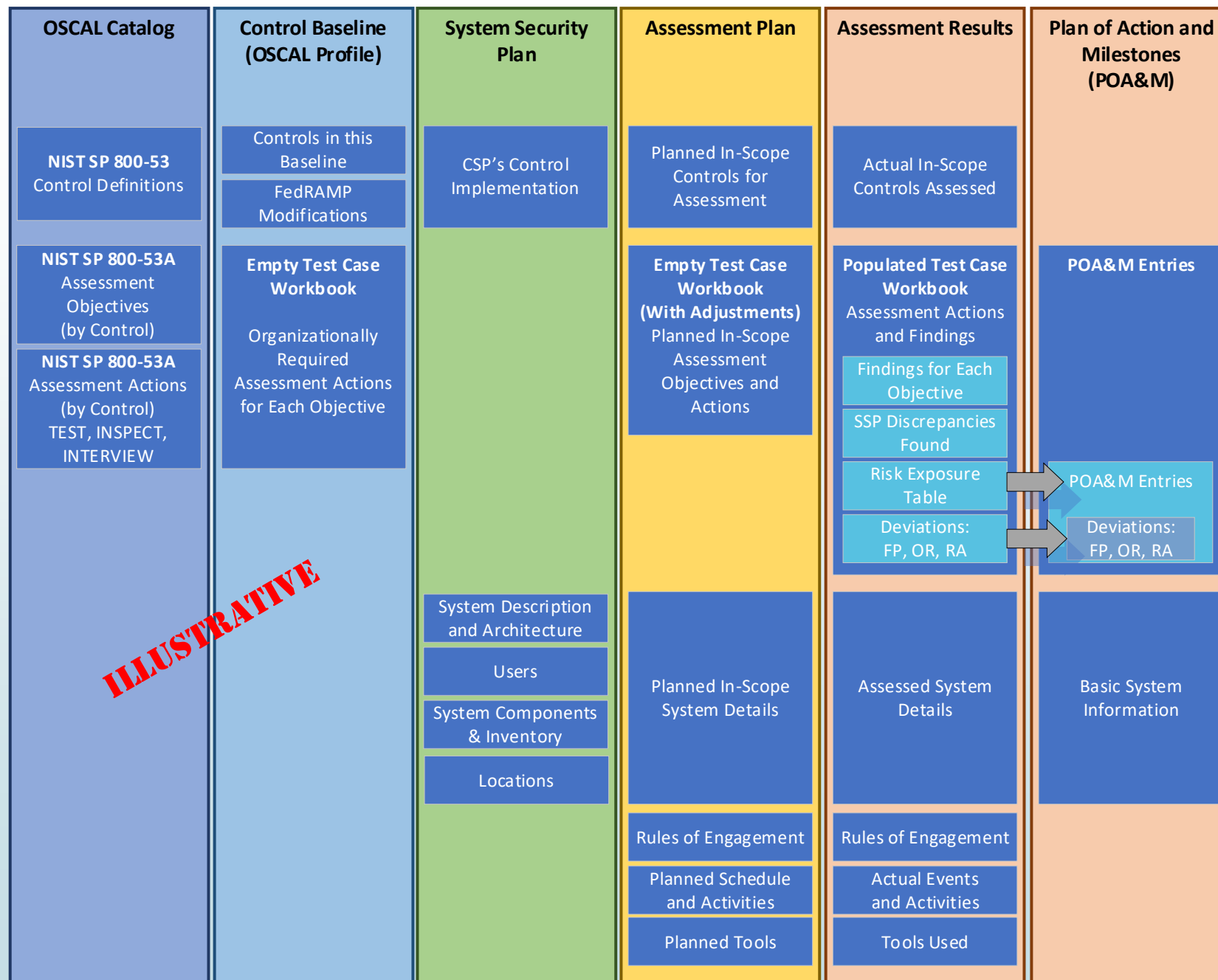


- OSCAL is designed for traceability
- In most cases:
  - Models to the right refer to content in models on the left, instead of duplicating content
  - There are a few exceptions

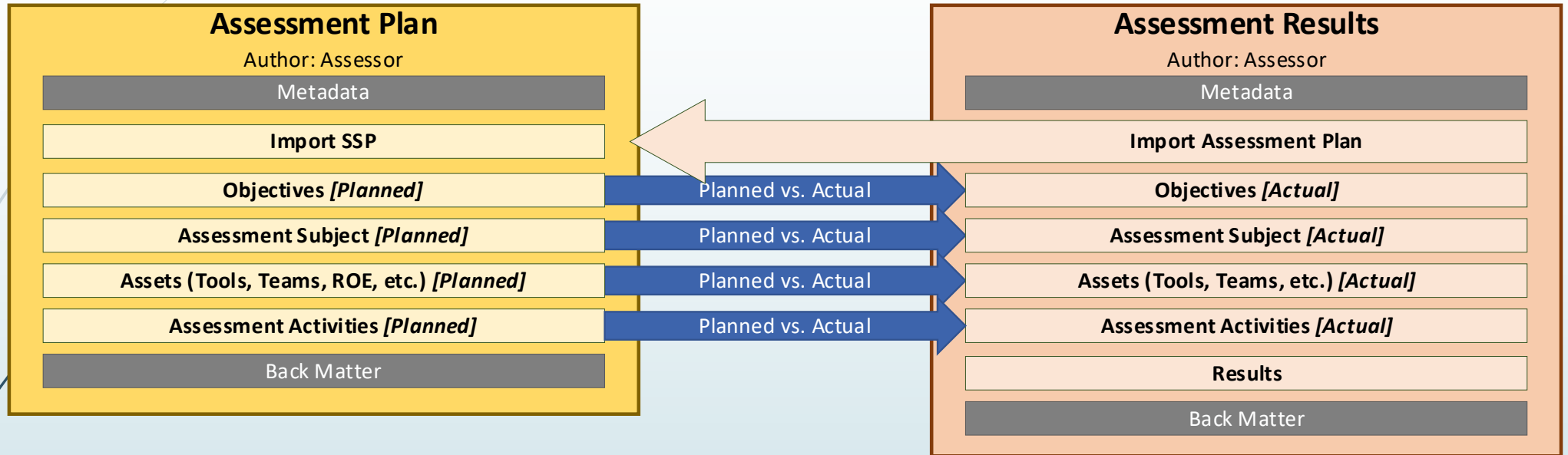
# Importance of Import

## ► FedRAMP Example

- The SSP refers to the profile and catalog for control definitions
- The Assessment Plan and Results refer to the SSP for system description and architecture



# Overlapping Syntax (AP and AR)



## Traditional Snapshot Approach

- **Assessment Plan:** What the assessor plans to do
- **Assessment Results:** What the assessor actually did

## Continuous Assessment Approach

- **Assessment Plan:** What should be tested/inspected, how, and in what frequency
- **Assessment Results:** Time-slice of results

# Assessment Plan and Assessment Results

## Common to AP and AR:

- Objectives
- Assessment Subject
- Assets
- Assessment Activities
- Back Matter (general)

## Unique to AR:

- Results
- Evidence in Back matter

### Objectives

In-Scope Controls  
Assessment Objectives & Methods

### Assessment Subject

Components and Inventory Items  
Locations  
User Types  
Interview Parties

### Assets

Assessment Team  
Penetration Test Team  
System Owner Test POCs  
Assessment Tools, Assumptions, & Methodology  
Rules of Engagement (ROE)

### Assessment Activities

Schedule  
Manual Tests  
Penetration Test

### Results (Current)

Findings / Observations  
Identified Risks, Calculations Deviations  
Recommendations and Remediation Plans  
Evidence Descriptions and Links  
Disposition Status

### Back Matter

Citations and External Links  
Attachments and Embedded Images

Evidence (Screen Shots, Photos, Interview Notes)

# Assessment Results: Time Slices

## Traditional Snapshot Approach

- Entire current assessment in one Results assembly
- Each past assessment cycle in its own results assembly

## Continuous Assessment Approach

- Each Results assembly is a snapshot in time
- Example: If testing once per hour, each results assembly represents the testing for that hour

## Assessment Results (AR)

Import Assessment Plan

Objectives

Assessment Subject

Assets

Assessment Activities

### Results (Current)

Findings / Observations  
Identified Risks, Calculations Deviations  
Recommendations and Remediation Plans  
Evidence Descriptions and Links  
Disposition Status

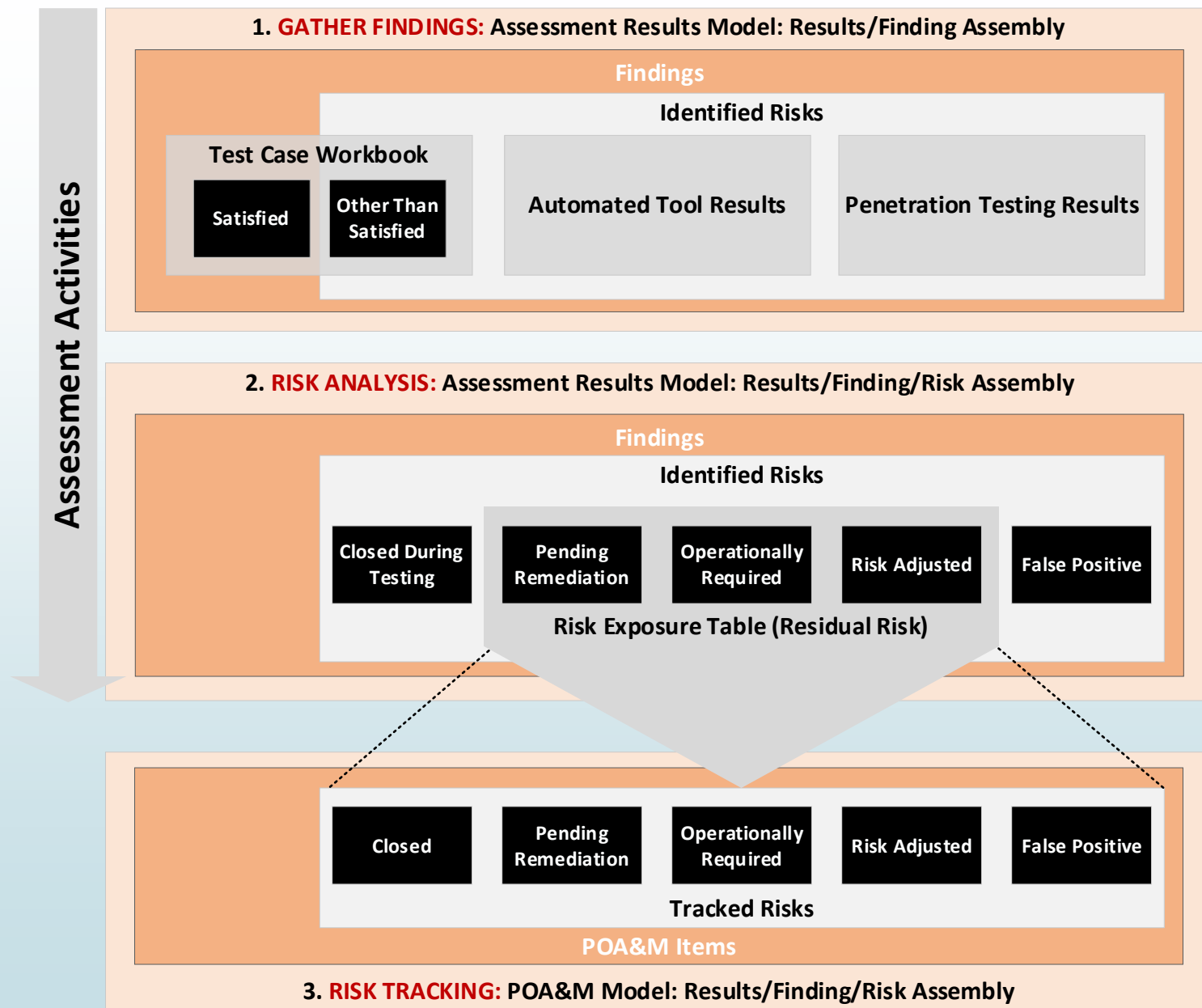
### Results (Last Cycle)

### Results (Earlier Cycle)

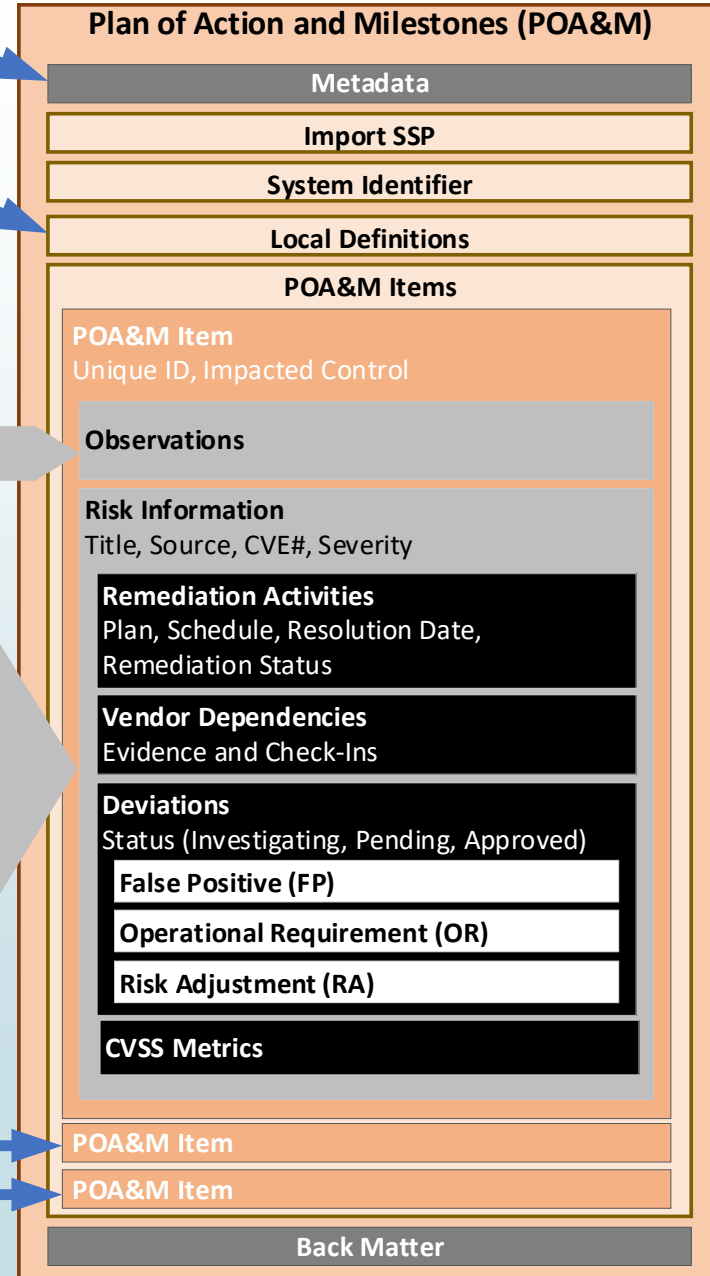
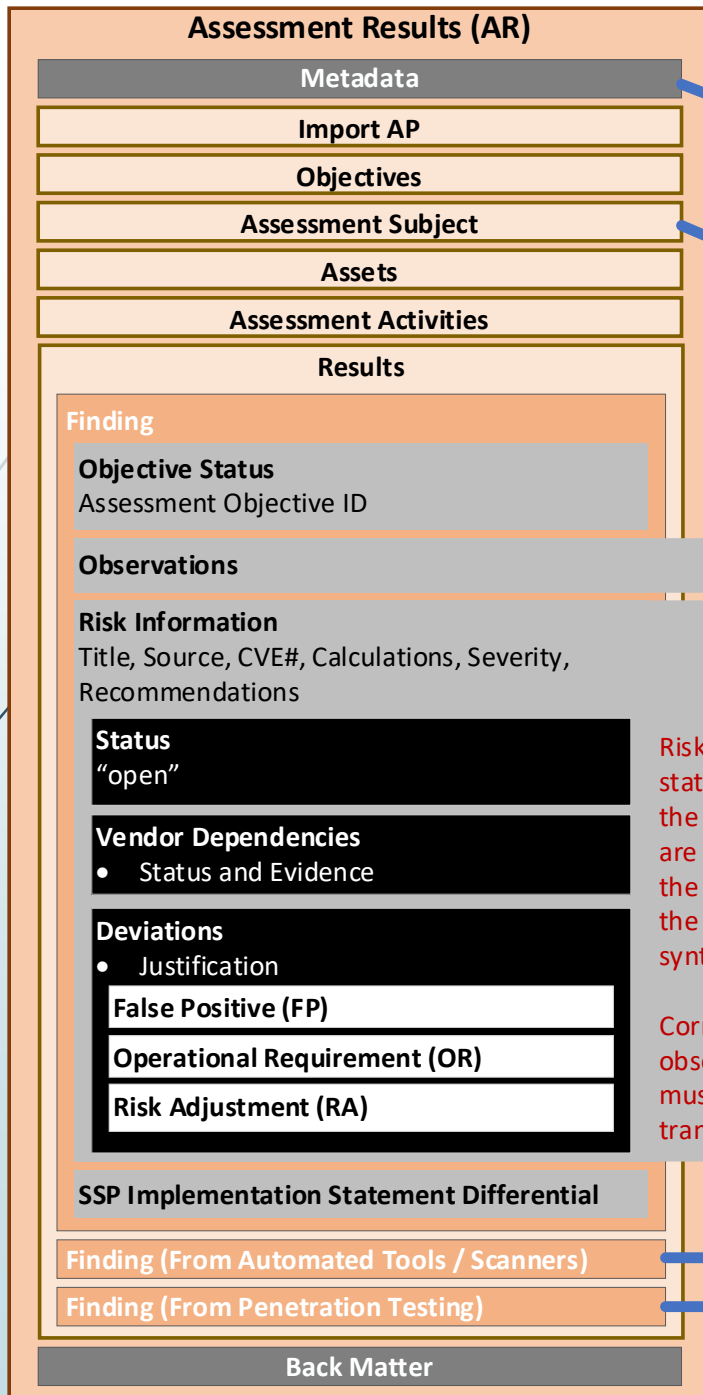


# Findings, Risks, Analysis, and Flow

1. Gather findings. Some findings demonstrate compliance. Other findings demonstrate a lack of compliance and represent a risk.
2. While performing risk analysis, some risks are closed during the assessment period. Others are identified as a false positive. Some open risks have mitigating factors, resulting in a risk adjustment. The remaining open and adjusted risks are typically populated in a risk exposure table.
3. All residual risks are typically entered into the POA&M by the system owner, where they are tracked until closure.



# Overlapping Syntax (AR and POA&M)



Risks with status='open' at the end of testing are transferred to the POA&M using the same OSCAL syntax.

Corresponding observations must also be transferred.

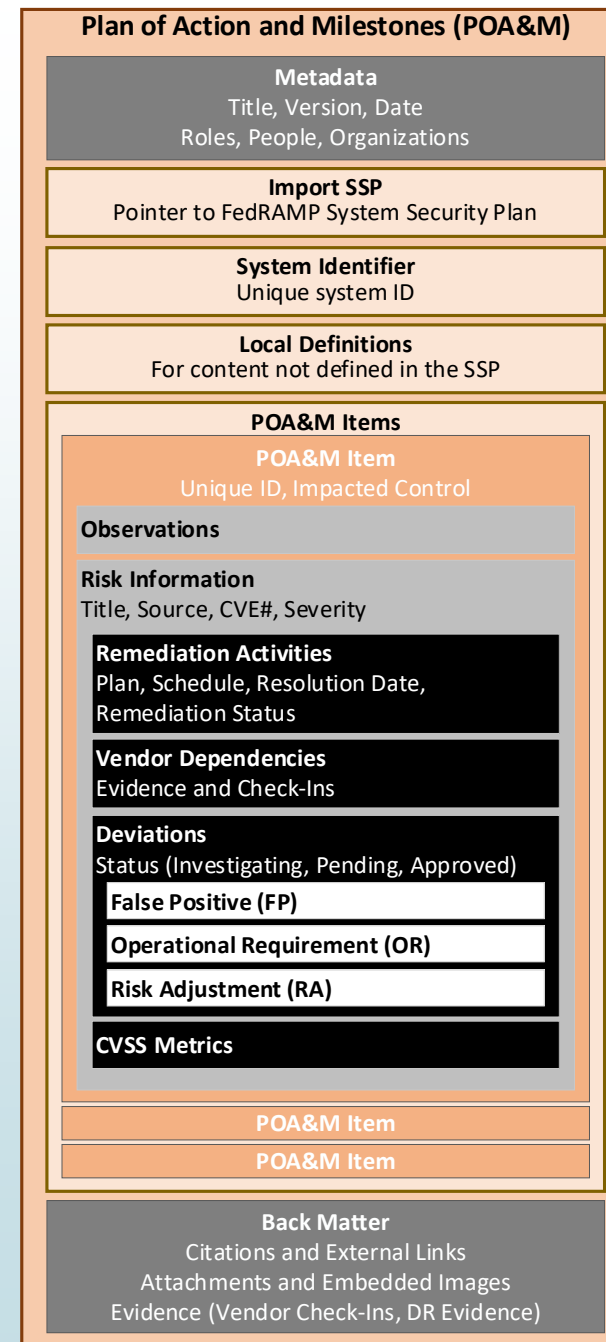
Typically all remaining assessment risks are entered into the POA&M. (not closed during testing, and not a verified FP)

To facilitate this, the syntax the same for an individual AR finding and an individual POA&M item.

While some detail, such as objective status, may be filtered, it can also travel to the POA&M along with the risk information if appropriate.

# POA&M Model

- ▶ Ideally the POA&M imports an SSP.
- ▶ The System Identifier is used when a POA&M is delivered without its corresponding SSP
  - ▶ Example: Monthly Continuous Monitoring (ConMon) delivery of a POA&M where an SSP is only delivered annually.
  - ▶ This enables another tool to re-link the POA&M and a previously delivered SSP.
- ▶ Scanning tools and missing SSP content are defined in the Local Definitions assembly.
- ▶ The structure provides robust remediation planning and tracking activities.
- ▶ The structure also provides risk metrics and deviation management for multiple different compliance frameworks. OSCAL enables these to co-exist in a single POA&M item entry.



# Questions? Thank you!

**We want your feedback!**

**OSCAL Repository:**

<https://github.com/usnistgov/OSCAL>

**Project Website:**

<https://www.nist.gov/oscal>

**How to Contribute:**

<https://pages.nist.gov/OSCAL/contribute/>

**FedRAMP Implementation Guides**

<https://github.com/gsa/fedramp-automation> (Available in July)

# Thank you

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